19 February 2021
EMA/707383/2020 Corr.1*[1]
Committee for Medicinal Products for Human Use (CHMP)

Assessment report

Comirnaty

Common name: COVID-19 mRNA vaccine (nucleoside-modified)

Procedure No. EMEA/H/C/005735/0000

Note

Assessment report as adopted by the CHMP with all information of a commercially confidential nature deleted.

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[1] * *Correction dated 19 February 2021 to clarify ERA statement*

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List of abbreviations

AE	adverse event
AESI	adverse event of special interest
BDR	blinded data review
BLQ	below the level of quantitation
BMI	body mass index
CD	Circular dichroism
CDC	Centers for Disease Control and Prevention (United States)
CGE	Capillary gel electrophoresis
COVID-19	coronavirus disease 2019
CPP	Critical Process Parameter
CQA	Critical Quality Attribute
CRF	case report form
CRM	Clinical Reference Material
CRO	contract research organization
CSR	clinical study report
CV	curriculum vitae
C&E	Cause and Effect Matrices
DCT	data collection tool
DLS	Dynamic Light Scattering
DMC	data monitoring committee
DOE	Design of experiments
DSPC	1,2-Distearoyl-sn-glycero-3-phosphocholine
e-diary	electronic diary
EU	European Union
FIH	first-in-human
FSFV	first subject first visit
GCP	Good Clinical Practice
GMC	geometric mean concentration
GMFR	geometric mean fold rise
GMR	geometric mean ratio
GMT	geometric mean titer
HBc Ab	hepatitis B core antibody

HBsAg	hepatitis B surface antigen
HBV	hepatitis B virus
HCS	human convalescent serum
HCV	hepatitis C virus
HCV	Ab hepatitis C virus antibody
HIV	human immunodeficiency virus
HPLC-CAD	High-Performance Liquid Chromatography - Charged Aerosol Detector
IA	interim analysis
ICD	informed consent document
ICH	International Council for Harmonisation
ICU	intensive care unit
IEC	independent ethics committee
IgG	immunoglobulin G
IgM	immunoglobulin M
IMP	investigational medicinal product
IND	Investigational New Drug
IPT-C	In-process testing control
IPT-M	In-process testing monitoring
IRB	institutional review board
IRC	internal review committee
IRR	illness rate ratio
IRT	interactive response technology
IVT	in vitro transcription
IWR	interactive web response
LAL	Limulus Amebocyte Lysate
LC-UV/MS	Liquid Chromatography – Ultraviolet / Mass Spectometry
LLOQ	lower limit of quantitation
LNP	lipid nanoparticle
MCB	Master Cell Bank
MedDRA	Medical Dictionary for Regulatory Activities
MERS	Middle East respiratory syndrome
mRNA	Messenger ribonucleic acid
modRNA	nucleoside-modified messenger ribonucleic acid

NAAT	nucleic acid amplification test
N-binding	SARS-CoV-2 nucleoprotein binding
NMT	Not more than
NOR	Normal Operating Range
NT50	neutralizing titer 50
NT90	neutralizing titer 90
NVA	nonvaccine antigen
P2 S	SARS-CoV-2 full-length, P2 mutant, prefusion spike glycoprotein
PAR	Proven Acceptable Range
(q)PCR	(quantitative) Polymerase Chain Reaction
PD	protocol deviation
Ph.Eur.	European Pharmacopoeia
PPQ	Process Performance Qualification
PRM	Primary Reference Material
Prevax	prevaccination
PT	preferred term
QA	quality assurance
QA	Quality Attribute
QTL	quality tolerance limit
RBD	receptor-binding domain
RCDC	reverse cumulative distribution curve
RDC	remote data capture
RNA	ribonucleic acid
RP-HPLC	Reverse Phase High Performance Liquid Chromatography
RT-PCR	Real Time Polymerase Chain Reaction
SAE	serious adverse event
SAP	statistical analysis plan
SARS	severe acute respiratory syndrome
SARS-CoV-2	severe acute respiratory syndrome coronavirus 2
SIRVA	shoulder injury related to vaccine administration
SMQ	standardized MedDRA queries
SOC	system organ class
Tdap	diphtheria vaccine toxoid; pertussis vaccine acellular 3 component; tetanus vaccine toxoid

TME	targeted medical event
TSE	Transmissible Spongiform Encephalopathy
UFDF	Ultrafiltration/diafiltration
US	United States
Vax	vaccination
VE	vaccine efficacy
WBC	white blood cell count
WCB	Working Cell Bank
WHO	World Health Organization
WRM	Working Reference Material
YOA	years of age

1. Background information on the procedure

1.1. Submission of the dossier

The applicant BioNTech Manufacturing GmbH submitted on 30 November 2020 an application for marketing authorisation to the European Medicines Agency (EMA) for Comirnaty, through the centralised procedure falling within the Article 3(1) and point 1 of Annex of Regulation (EC) No 726/2004. The eligibility to the centralised procedure was agreed upon by the EMA/CHMP on 23 July 2020.

The applicant applied for the following indication:

"Active immunisation to prevent COVID-19 disease caused by SARS-CoV-2 virus, in individuals 16 years of age and older. The use of Comirnaty vaccine should be in accordance with official guidance."

The legal basis for this application refers to:

Article 8.3 of Directive 2001/83/EC - complete and independent application.

The application submitted is composed of administrative information, complete quality data, non-clinical and clinical data based on applicants' own tests and studies and/or bibliographic literature substituting/supporting certain tests or studies.

Information on Paediatric requirements

Pursuant to Article 7 of Regulation (EC) No 1901/2006, the application included an EMA Decision P/0480/2020 on the agreement of a paediatric investigation plan (PIP).

At the time of submission of the application, the PIP P/0480/2020 was not yet completed as some measures were deferred.

Similarity

Pursuant to Article 8 of Regulation (EC) No. 141/2000 and Article 3 of Commission Regulation (EC) No 847/2000, the applicant did not submit a critical report addressing the possible similarity with authorised orphan medicinal products because there is no authorised orphan medicinal product for a condition related to the proposed indication.

Conditional marketing authorisation

The applicant requested consideration of its application for a Conditional marketing authorisation in accordance with Article 14-a of the above-mentioned Regulation, as it is intended for the prophylaxis of a life-threatening disease. In addition, the above-mentioned medicinal product is intended for use in an emergency situation, in response to public health threats duly recognised by the World Health Organisation and by the Union.

New active Substance status

The applicant requested the active substance Single-stranded, 5'-capped messenger RNA produced using a cell-free in vitro transcription from the corresponding DNA templates, encoding the viral spike

(S) protein of SARS-CoV-2 contained in the above medicinal product to be considered as a new active substance, as the applicant claims that it is not a constituent of a medicinal product previously authorised within the European Union.

Scientific advice

The applicant did not seek Scientific advice from the CHMP.

COVID -19 EMA pandemic Task Force (COVID- ETF)

In line with their mandate as per the EMA Emerging Health Threats Plan, the ETF undertook the following activities in the context of this marketing authorisation application:

The ETF confirmed eligibility to the rolling review procedure based on the information provided by the applicant and agreed the start of the rolling review procedure.

Furthermore, the ETF discussed the (Co-)Rapporteur's assessment reports overviews and provided their recommendation to the CHMP in preparation of the written adoption rolling review procedures. The corresponding interim opinions were subsequently adopted by the CHMP.

For the exact steps taken at ETF, please refer to section 1.2.

1.2. Steps taken for the assessment of the product [2]

The Rapporteur and Co-Rapporteur appointed by the CHMP were:

Rapporteur: Filip Josephson Co-Rapporteur: Jean-Michel Race

The CHMP confirmed eligibility to the centralised procedure on	23 July 2020
Confirmation by ETF on the eligibly to the rolling review procedure on	24 July 2020
Agreement by ETF to start the rolling review procedure on	25 September 2020
The applicant submitted documentation as part of a rolling review on non-clinical data to support the marketing authorisation application	05 October 2020
The procedure (Rolling Review 1) started on	06 October 2020
The Rapporteur's first Assessment Report was circulated to all CHMP, Peer Reviewer and ETF on	22 October 2020
The Rapporteurs circulated updated Joint Assessment reports to all CHMP, Peer Reviewer and ETF on	28 October 2020
ETF discussions took place on	29 October 2020
Adoption of first Interim Opinion on the RR via 24 hour written procedure on	06 November 2020
The applicant submitted documentation as part of a rolling review on quality data to support the marketing authorisation application	06 November 2020

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[2] These steps do not reflect the additional submissions made by the applicant during the active assessment phases.

The procedure (Rolling Review 2) started on	07 November 2020
The Rapporteur's first Assessment Report was circulated to all CHMP, BWP, Peer Reviewer and ETF on	19 November 2020
BWP extraordinary adobe meeting was held on	24 November 2020
Updated joint draft overview and LoQ drafted by Rapporteurs and circulated to CHMP and ETF on	25 November 2020
ETF discussions took place on	26 November 2020
Adoption of the 2nd interim opinion for this rolling review on	30 November 2020
The application for the marketing authorisation was formally received by the EMA on	30 November 2020
The procedure started on	1 December 2020
BWP extraordinary adobe meeting was held on	15 December 2020
The Rapporteur's first Assessment Report was circulated to all CHMP, BWP, peer reviewer and ETF on	16 December 2020
The Co-Rapporteur's first Assessment Report was circulated to all CHMP members on	16 December 2020
BWP extraordinary adobe meeting with an Oral Explanation by the applicant was held on	16 December 2020
ETF discussions took place on	17 December 2020
The Rapporteurs circulated the Joint Assessment Report to all CHMP members on	17 December 2020
BWP extraordinary adobe meeting was held on	18 December 2020
The PRAC agreed on the PRAC Assessment Overview and Advice to CHMP during an extraordinary meeting on	18 December 2020
CHMP extraordinary adobe meeting was held on	18 December 2020
The following GMP and GLP inspections were requested by the CHMP and their outcome taken into consideration as part of the Quality/Safety/Efficacy assessment of the product:	
☐ GMP inspections (distant assessments) of the sites Wyeth BioPharma, Andover (manufacturer DS, QC DS, QC DP) and Pfizer Inc., Chesterfield (QC DP, QC DP), both located in the USA, were carried out between 20 November 2020 and 02 December 2020. The outcome of the inspections carried out were issued on 15 December 2020.	15 December 2020
☐ A GLP inspection at a CRO in Germany between 3 to 6 November 2020. The outcome of the inspection carried out was issued on 6 November 2020.	6 November 2020

The CHMP, in the light of the overall data submitted and the scientific discussion within the Committee, issued a positive opinion for granting a conditional marketing authorisation to Comirnaty on	21 December 2020

2. Scientific discussion

2.1. Problem statement

2.1.1. Disease or condition

COVID-19 is caused by SARS-CoV-2, a zoonotic virus that first emerged as a human pathogen in China and has rapidly spread around the world by human to human transmission. In December 2019, a pneumonia outbreak of unknown cause occurred in Wuhan, China. In January 2020, it became clear that a novel Coronavirus (2019-nCoV) was the underlying cause. In early January 2020, the genetic sequence of the 2019-nCoV became available to the World Health Organization (WHO) and public, and the virus was categorized in the Betacoronavirus subfamily. By sequence analysis, the phylogenetic tree revealed a closer relationship to severe acute respiratory syndrome (SARS) virus isolates than to other coronaviruses that infect humans, including the Middle East respiratory syndrome (MERS) coronavirus. SARS-CoV-2 infections and the resulting disease COVID-19 have spread globally, affecting a growing number of countries. On 11 March 2020 the WHO characterized the COVID-19 outbreak as a pandemic. As of 01 December 2020, there have been >63 million globally confirmed COVID-19 cases and >1.4 million deaths, with 191 countries/regions affected.

At the time of this marketing application submission, confirmed cases and mortality continue to rise globally. The ongoing pandemic remains a significant challenge to public health and economic stability worldwide.

2.1.2. Epidemiology and risk factors

Every individual is at risk of infection as there is no pre-existing immunity to the SARS-CoV-2. Following infection some but not all individuals develop protective immunity in terms of neutralising antibody responses and cell mediated immunity. However, it is currently unknown to what extent and for how long this protection lasts.

According to WHO 80% of infected individuals recover without need for hospital care, while 15% develop more severe disease and 5% need intensive care.

Increasing age and underlying medical conditions are considered risk factors for developing severe disease.

2.1.3. Aetiology and pathogenesis

SARS-CoV-2 is an RNA virus with four structural proteins. One of them, the Spike protein is a surface protein which binds the angiotensin-converting enzyme 2 (ACE-2) present on host cells. Therefore, the Spike protein is considered a relevant antigen for vaccine development. It has been shown that antibodies against the Spike protein neutralise the virus and prevent infection.

2.1.4. Clinical presentation and diagnosis

The presentation of COVID-19 is generally with cough and fever, with chest radiography showing ground-glass opacities or patchy shadowing. However, many patients present without fever or radiographic changes, and infections may be asymptomatic which is relevant to controlling transmission. For symptomatic subjects, progression of disease may lead to acute respiratory distress syndrome requiring ventilation and subsequent multi-organ failure and death.

Common symptoms in hospitalized patients (in order of highest to lowest frequency) include fever, dry cough, shortness of breath, fatigue, myalgias, nausea/vomiting or diarrhoea, headache, weakness, and rhinorrhoea. Anosmia (loss of smell) or ageusia (loss of taste) may be the sole presenting symptom in approximately 3% of individuals who have COVID-19.

The US Centres for Disease Control and Prevention (CDC) defined COVID-19 symptoms as including 1 or more of the following:

- ☒ Fever
- ☒ New or increased cough
- ☒ New or increased shortness of breath
- ☒ Chills
- ☒ New or increased muscle pain
- ☒ New loss of taste or smell
- ☒ Sore throat
- ☒ Diarrheal
- ☒ Vomiting
- ☒ Fatigue
- ☒ Headache
- ☒ Nasal congestion or runny nose
- ☒ Nausea

All ages may present with the disease, but notably case fatality rates (CFR) are elevated in persons >60 years of age. For example, in Italy the CFR was 0.3% in adults <40 years of age but 12.8% in adults 70 to 79 years of age and 20.2% in paW□HQWVHDUVRIDJH&RPRUELGLW□HVDUHDOVR□ associated with increased CFR, including cardiovascular disease, diabetes, hypertension, and chronic respiratory disease. Healthcare workers are overrepresented among COVID-19 patients due to occupational exposure to infected patients.

In most situations, a molecular test is used to detect SARS-CoV-2 and confirm infection. The reverse transcription polymerase chain reaction (RT-PCR) test methods targeting SARS-CoV-2 viral RNA are the gold standard in vitro methods for diagnosing suspected cases of COVID-19. Samples to be tested are collected from the nose and/or throat with a swab. Molecular methods used to confirm an active infection are usually performed within a few days of exposure and around the time that symptoms may begin.

2.1.5. Management

The management of COVID-19 has developed during 2020, and now includes antiviral therapy (e.g. remdesivir), antibodies administered from convalescent plasma and hyperimmune immunoglobulins, anti-inflammatory agents such as dexamethasone and statins, targeted immunomodulatory agents and anticoagulants. These therapies have shown variable and limited impact on the severity and duration of illness, with different efficacies depending on the stage of illness and manifestations of disease.

While care for individuals who have COVID-19 has improved with clinical experience, there remains an urgent and unmet medical need for a prophylactic vaccine during the ongoing pandemic, both for protection of particularly vulnerable groups as well as mitigating the effects of the pandemic at a population level, e.g. to maintain a functioning health care system, and to avoid the social and economic consequences of the stringent measures needed to diminish virus spread. There is currently no approved vaccine in EU for prevention of COVID-19.

About the product

BNT162b is a mRNA vaccine for prevention of COVID-19. The vaccine is made of a mRNA encoding for the full-length SARS-CoV-2 spike glycoprotein (S) encapsulated in lipid nanoparticles (LNPs). The sequence of the S protein was chosen based on the sequence for the "SARS-CoV-2 isolate Wuhan-Hu-1", which was available when the program was initiated: GenBank: MN908947.3 (complete genome) and GenBank: QHD43416.1 (spike surface glycoprotein).

The active substance consists of a single-stranded, 5'-capped mRNA that is translated into a codon-optimized sequence encoding the spike antigen of SARS-CoV-2. The RNA contains common structural elements optimized for mediating high RNA stability and translational efficiency (see section 2.2). The LNPs protect the RNA from degradation by RNAses and enable transfection of host cells after intramuscular (IM) delivery.

The mRNA is translated into the SARS-CoV-2 S protein in the host cell cytosol. The S protein is then expressed on the cell surface where it induces an adaptive immune response. The S protein is identified as a target for neutralising antibodies against the virus and is therefore considered a relevant vaccine component.

The vaccine, BNT162b2 (30 µg), is administered intramuscularly (IM) in two 30 µg doses of the diluted vaccine solution given 21 days apart.

Intended indication: '*Active immunisation to prevent COVID-19 disease caused by SARS-CoV-2 virus, in individuals 16 years of age and older*'.

Type of Application and aspects on development

The applicant requested consideration of its application for a Conditional Marketing Authorisation in accordance with Article 14-a of the above-mentioned Regulation, based on the following criteria:

☒ The benefit-risk balance is positive:

According to the Applicant, there is a positive benefit-risk balance for Comirnaty in the active immunisation to prevent COVID-19 disease caused by SARS-CoV-2, in individuals 16 years of age and older. This is based on evidence from the pivotal study C4591001 (also referred to as BNT162-02), a Phase 1/2/3, placebo-controlled, randomized, observer-blind, dose-finding Study investigating the safety, tolerability, immunogenicity, and efficacy of SARS-COV-2 RNA Vaccine Candidates Against COVID-19 in healthy individuals.

The Applicant stated that the available data to date indicate that its vaccine was 95 percent effective and had no serious side effects, showing that the vaccine prevented mild and severe forms of COVID-19.

☒ It is likely that the applicant will be able to provide comprehensive data.

The Applicant intends to continue the ongoing pivotal Phase 3 study with participants as originally allocated for as long as possible, to obtain long-term data and to ensure sufficient follow-up to support a standard marketing authorisation. In case of availability of any COVID-19 vaccine, the sponsor will appeal to participants to remain in the ongoing study as originally randomized for as long as possible, ideally until a COVID-19 vaccine has full regulatory approval. In all cases, it is intended to follow participants up to the original planned 24 months post-vaccination, regardless of any participants opting to crossover from placebo to active vaccination. The safety and effectiveness of COMIRNATY in individuals <16 years of age have not been established for this application. Four studies in paediatric subjects are planned as laid down in the paediatric investigation plan. A study in pregnant women is also planned in the EU. A Post-Approval Active Surveillance Safety Study to Monitor Real-World Safety of Comirnaty (Study C4591010) will be conducted in the EU using primary data collection that monitors a cohort of vaccinees and evaluates risk of AESIs. The Applicant will also conduct, non-interventional studies (test negative design) of individuals presenting to the hospital or emergency room with symptoms of potential COVID-19 in a real-world setting. These studies will allow to determine the effectiveness of vaccine in a real-world setting and against severe disease, and in specific racial, ethnic, and age groups.

☒ Unmet medical needs will be addressed

According to the Applicant, as there is no approved other vaccine in the EU or successful COVID-19 therapy available in the EU, unmet medical need is existing and is likely to be addressed by this vaccine in view of the high level of protection observed in the pivotal clinical trial.

☒ The benefits to public health of the immediate availability outweigh the risks inherent in the fact that additional data are still required.

According to the Applicant, Efficacy of COMIRNATY to prevent COVID-19 was demonstrated at the final DQDO\VLV7KHREVHUYHGHIILFDF\LQHDFKVXEJURXSDVGHILQHGE\DJHLQFOXGLQJHOGHUO\HDUVROGVH[race/ethnicity, country, obese subjects, and subjects at risk due to comorbidities, was overall consistent with the effectiveness of BNT162b2 to protect vaccinees against the disease. The benefit of immediate availability of Comirnaty through conditional marketing authorisation is based on the fact that there is no approved vaccine or successful COVID-19 therapy available in the European Union. An effective vaccine can impact the pandemic at this critical time and a COVID-19 vaccination program implemented soon can likely prevent further pandemic waves and thus substantially reduce mortality due to disease.

2.2. Quality aspects

2.2.1. Introduction

7KHILQLVKHGSURGXFWLVSUHVHQWHGDVDFRQFHQWUDWHIRUGLVSHUVLRQIRULQMHFWLRQFRQWDLQLQJ mL (prior to dilution) of BNT162b2 (5’capped mRNA encoding full length SARS-CoV-2 Spike protein) as active substance (AS).

Other ingredients are: ALC-0315 (4-hydroxybutyl)azanediyl)bis(hexane-6,1-diyl)bis(2-hexyldecanoate), ALC-0159 (2-[(polyethylene glycol)-2000]-N,N-ditetradecylacetamide), 1,2-

Distearoyl-sn-glycero-3-phosphocholine (DSPC), cholesterol, potassium chloride, potassium dihydrogen phosphate, sodium chloride, disodium phosphate dihydrate, sucrose and water for injections.

The product is available in a 2 mL clear vial (type I glass) with a stopper (synthetic bromobutyl rubber) and a flip-off plastic cap with aluminium seal. Pack size: 195 vials.

The multidose (5 dose) vial is stored frozen and must be thawed prior to dilution. After thawing, the vaccine should be diluted and used immediately.

After dilution with 1.8 mL sodium chloride (0.9%) solution (not supplied), one dose (0.3 mL) contains 30 micrograms of COVID-19 mRNA Vaccine (embedded in lipid nanoparticles).

2.2.2. Active Substance

General Information

The active substance consists of a single-stranded, 5'-capped mRNA that is translated into a codon-optimised sequence encoding the spike antigen of SARS-CoV-2. The vaccine is based on the spike glycoprotein (S) of SARS-CoV-2. The sequence was chosen based on the sequence for the "Severe acute respiratory syndrome coronavirus 2 isolate Wuhan-Hu-1". The protein sequence contains two proline mutation, which ensures an antigenically optimal pre-fusion confirmation (P2 S). The RNA does not contain any uridines; instead of uridine the modified N1-methylpseudouridine is used in RNA synthesis. The applicant will provide clarification on the mechanism of action for BNT162b2.

Manufacture, process controls and characterisation

Manufacturers

The active substance is manufactured and controlled by either Wyeth BioPharma Division, Andover, United States or by BioNTech Manufacturing GmbH, Mainz, Germany, and Rentschler Biopharma SE, Laupheim, Germany.

During the procedure, a number of issues were highlighted relating to the GMP status of the manufacture of the active substance and of the testing sites of the finished product for the purpose of batch release. These issues were classified as a Major Objection (MO). After further information was obtained from the sites and inspectors, the MO was considered resolved.

EU GMP certificates for the manufacturing and testing sites were subsequently obtained. In conclusion, appropriate manufacturing authorisations and GMP certificates are in place for all active substance and finished product manufacturing sites.

Description of manufacturing process and process controls

Information on the manufacturing process and process controls for both the Andover and the BNT Mainz & Rentschler manufacturing sites were provided.

The manufacturing process of BNT162b2 active substance involves five major steps. The RNA is synthesised from linear DNA via an in vitro transcription (IVT) step. The IVT step is followed by a number of purification and filtration steps. Lastly, the RNA undergoes a final filtration before being dispensed and stored frozen.

Flow diagrams were provided, presenting the process steps, process inputs and the process controls for each step. The purpose of each step in the manufacturing process is sufficiently described. The ranges of hold times and process parameters and routine in-process controls are listed with corresponding acceptance criteria, for each step. It is noted that not all process parameters are listed, but that the lists include all critical and several non-critical process parameters. It is agreed that the key process parameters are described in the dossier. The applicant has agreed to upgrade these parameters to critical process parameters (CPPs) and to include acceptable ranges for these CPPs. Updated information has been submitted during the procedure which comprised modifications of the acceptable ranges of several process parameters and the addition of some controls. The strategy is found acceptable, and the Applicant will provide information on acceptable ranges for some parameters.

The active substance is stored between -15°C and -25°C. Transportation using an insulated shipper is qualified and shipping time to finished product manufacturing sites are defined. Shipping validation of the intermediate has been agreed as recommendation.

The batch numbering system is sufficiently described.

Control of materials

An adequate overview of the raw materials and solutions used in the active substance manufacturing process is provided.

Representative certificates of analysis have been provided. The submitted information supports the appropriate quality of raw materials. It is recommended that the applicant should implement relevant testing strategies to ensure an adequate microbiological control for the starting materials **(REC1)** and should implement a relevant testing strategy to ensure that HEPES (Pfizer) raw material, included in the formulation buffer of FP, is free from contaminating RNases **(REC2).** The description of synthesis of 5’cap and its related impurities were requested during the procedure. Appropriate information was given. The applicant should implement in-house functional activity analytical methods for release testing of enzymes used in the manufacturing process at all relevant manufacturing sites, by Q1 2021 **(REC3)**.

The BNT162b2 active substance is manufactured by in vitro transcription using a linear DNA template, produced via plasmid DNA from transformed *Escherichia coli* cells.

The linear DNA template is not part of the final product but defines the sequence of the mRNA product and therefore it is fundamental to ensure the adequate control of the active substance. Changes to the manufacturing process of the linear DNA template (e.g. change to plasmid host cell) may result in a different impurity profile in the active substance. Additional details on the manufacturing process and the control strategy for this starting material, initially only shortly described, have been provided and the dossier will be updated accordingly.

The cell banks involved in the plasmid manufacturing process are described. Master cell bank (MCB) and working cell bank (WCB) qualification tests are listed. Relevant specifications are set and data from the current MCB and WCB are provided. The plasmid MCBs and WCBs are enrolled in a cell bank stability program. The strategy is considered adequate, noting that the dossier will be updated as appropriate. A protocol for establishment of future WCBs is provided.

Following fermentation, the cells are harvested and chemically lysed to recover the plasmid DNA. After this lysis step, the circular plasmid DNA is purified. The circular plasmid DNA is filtered and stored frozen. The strategy for establishing the initial shelf-life is endorsed and data provided support the proposed shelf life. A list of the raw materials as well as other materials used in the manufacture of the linear DNA template is provided. All materials used are animal origin free and sourced from approved suppliers.

Specifications for the circular plasmid DNA as well as for the DNA linear template are provided. Process- and product-related impurities including host cell genomic DNA, RNA, proteins, endotoxins, bioburden and plasmid isoforms, for the plasmid DNA, are routinely quantified. The reference material is described. Implementation of any changes in the manufacture of the linear DNA template should be applied for in a variation application.

Control of critical steps and intermediates

Process parameters and tests that are used to control the process and active substance quality are provided. The list of CPPs was provided with corresponding updated acceptable ranges.

A summary of the quality attributes with the rationale for the criticality assignment is provided. The rationale for classification into CQA or QA is presented for each attribute and appears reasonable.

The in-process test methods are defined and described in the dossier.

Acceptable information has been provided on the control system in place to monitor and control the active substance manufacturing process with regard to critical, as well as non-critical operational parameters and in-process tests. Actions taken if limits are exceeded are specified.

Process validation

The BNT162b2 active substance manufacturing process has been validated adequately. Consistency in production has been shown on full scale commercial process validation/ process performance qualification batches at all sites. All acceptance criteria for the critical operational parameters and acceptance criteria for the in-process tests are fulfilled demonstrating that the purification process consistently produces active substance of reproducible quality that complies with the predetermined specification and in-process acceptance criteria.

In comparability studies, a decrease in RNA integrity was observed for the initial Process 2 batches compared to Process 1 batches. This is further discussed in the subsequent section on manufacturing process development. After adjustment of process parameters for CTP and ATP volumes, RNA integrity level is more consistent and verify that the volume adjustments made for ATP and CTP volumes consistently provide reproducible results with RNA integrity levels more similar to levels achieved in Process 1 batches. Since the target volumes for ATP and CTP have been increased, the proven acceptable ranges (PARs) ranges need to be adjusted and the dossier updated accordingly **(REC8)**. The robustness of the DNase digestion step is not considered comprehensively demonstrated although there is routine control of residual DNA impurities at the active substance level. It has been confirmed that studies to enhance the robustness of this step are ongoing and these should be reported **(REC7).** The finalised indirect filter qualification assessment, according to the applicant, already available and should be provided for evaluation **(REC6)**.

Relevant hold times and transport times have been defined and were validated by appropriate studies.

The shipping qualification strategy is described in detail and considers both thermal and mechanical aspects of shipping. The shipping procedures and configuration for transport of frozen AS to the finished product manufacturing sites were validated to maintain product temperature in the acceptable range for a defined duration.

A transport verification study is planned and results will be available in Q1/2021. The recommendation to provide shipping performance qualification data has been agreed **(REC6)**.

Manufacturing process development

Process development changes were adequately summarised. Two active substance processes have been used during the development history; Process 1 (clinical trial material) and Process 2 (commercial process). Details about process differences, justification for making changes, and results from a comparability study are provided. The major changes between active substance process versions were described in the dossier.

Batch analysis results showing comparability between non-clinical and clinical batches are provided. Additional characterization of product-related species and their relation to final product specifications will be provided as a specific obligation.

Electropherograms were presented demonstrating similarities in the peak pattern of RNA species, but some differences between Process 1 and 2 were also noted. It can therefore not be concluded that identical species are obtained by the processes. It is likely that the fragmented species will not result in expressed proteins, due to their expected poor stability and poor translational efficiency (see below). However, the lack of experimental data on the truncated RNA and expressed proteins does not permit a definitive conclusion and needs further characterisation. Therefore, additional characterisation data remain to be provided as a specific obligation **(SO1)**.

Regarding the 5′ cap end of the AS, reversed phase high performance liquid chromatography-UV and mass spectrometry (LC- UV/MS) characterisation confirmed that the 5'-capped and uncapped structures are the same but that there is a slight shift towards higher 5'-capping levels in Process 2. The reported quality attribute ‘capped-intact RNA’ is intended to reflect the proportion of the RNA molecules in the active substance that are a fully intact molecule and have the 5′-cap. It is noted that the capped-intact RNA is not measured, but only calculated from the results of 5′-cap and %RNA integrity tests. Therefore, this argument alone cannot fully confirm the comparability of Process 2 versus Process 1, and further characterisation data and justification of specifications were requested.

According to the Applicant, the majority of fragments are expected to be comprised of truncated transcripts including the 5′ region but lacking the 3′ region and poly(A)tail. However, the results indicating a substantial proportion of shorter/truncated mRNA with both cap and poly(A)tail are not in agreement with this statement. Therefore, the Applicant was asked to discuss and justify the obtained results and explain the apparent discrepancy. Additional characterisation data using an orthogonal method with enriched samples for fragmented species was provided. Preliminary characterization data on isolated fragmented species suggests they predominantly include the 5′-cap but lack the poly(A) tail, supporting the hypothesis that most fragments would arise from premature termination in the IVT reaction. The characterisation data are requested to be completed with analysis of the main peak from ion pairing RP-HPLC and analysis of other samples from Process 1 and optimised Process 2 **(SO1).** The Applicant will continue to evaluate any potential overestimation of poly(A) tail and should characterise fragments for any future AS process changes **(SO1)**.

Furthermore, the poly(A)tail of the 3′ end was characterised by LC-UV/MS. While the results were demonstrated to be comparable between Process 1 and Process 2 batches, significant differences were identified. As expected, poly(A) tail heterogeneity was observed both for Process 1 and Process 2 batches. Thus, slight differences in the poly(A)tail pattern were observed when comparing Process 1 and Process 2 AS batches. The Applicant explains that the redistribution is probably due to the use of a linearised DNA plasmid template in Process 2 instead of a PCR-derived DNA template in Process 1. For both processes, the poly(A)tail is anticipated to be sufficiently long to guarantee stability of the RNA and function in translation. This explanation is considered reasonable by the CHMP.

The overall primary sequence of BNT162b2 active substance was demonstrated to be comparable by LC/MS/MS -oligonucleotide mapping. Circular dichroism (CD) spectroscopy confirmed that the higher-order structure of Process 1 and Process 2 AS batches were comparable.

To demonstrate functionality, the protein size after in-vitro expression of BNT162b2 active substance was determined. The expressed protein sizes were demonstrated to be comparable between Process 1 and Process 2 batches. However, further clarification is requested and include correlation with the calculated molecular weights of the intact S1S2 protein should be demonstrated. **(SO1)**.

A second comparability study was presented to assess comparability across the Process 2 manufacturing facilities, batches each from the Andover and BioNTech sites were included in the study. In addition, Process 2 batches, planned for clinical supply and for emergency supply in the US market and representative batches from Process 1 were included in the comparison.

In conclusion, the Process 2 batches manufactured at the Andover and BioNTech sites were demonstrated to be comparable with respect to identity as monitored by agarose gels and 5'Cap structure characterised by LC-UV and subsequent MS analysis. Furthermore, the primary sequence and the secondary structure was demonstrated to be comparable for all Process 1 and Process 2 batches included in the study. Poly(A) tail length and distribution was investigated by RP-HPLC and MS analysis. All process 2 batches were found comparable, while the Process 1 batches showed a somewhat different poly(A) tail pattern.

The expressed protein size after in-vitro expression of BNT162b2 active substance was determined and the results demonstrate comparability between batches. However, the identity of the bands identified by WB are not sufficiently justified and further clarification is requested **(SO1)**.

Overall, the submitted data confirm consistent and comparable quality of Process 2 batches manufactured at the Andover and BioNTech sites.

Process characterisation studies using scale-down models of individual unit operations, were performed.

It should be noted that future changes to any of the process parameters, regardless of the classification of CPP or non-CPP, should be applied for as variation to the terms of the MA.

Initially, addition volumes for ATP and CTP were identified as non-CPPs as both were supplied in theoretical excess. Following additional manufacturing campaigns and additional small-scale studies it was shown that these volumes could be limiting, and the ranges were widened at the higher end. It is noted that after the adjustment of these volumes, the percentage of RNA integrity has increased to levels more consistent with Process 1 batches. Nevertheless, since the target volumes for ATP and CTP have been increased to avoid that these nucleotides are rate-limiting in order to increase the percentage of RNA integrity, the PAR ranges need to be adjusted and the dossier updated accordingly **(REC8)**.

The acceptable ranges for CPPs will be updated in the dossier.

A safety risk assessment for potential process-related impurities included in the active substance process relative to patient safety was performed. The sources of the impurities are sufficiently addressed.

The safety risk assessment strategy involves comparison of the theoretical worst-case concentration of impurities, assuming no removal, to calculated safety concern thresholds.

The worst-case levels of residual raw materials and reagents from the BNT162b2 active substance manufacturing process were calculated to be significantly below the pre-determined safety limits. This is found acceptable.

Characterisation

Analytical characterisation was performed on BNT162b2 active substance manufactured at commercial scale. This is found acceptable.

The physico-chemical characterisation involved primary structure, 5’ cap structure, poly(A)tail and higher order structure evaluation. Primary structure was confirmed by oligonucleotide mapping and the orthogonal method, RNA sequencing using Next Generation Sequencing (NGS) technology. The results confirm the RNA sequence. The 5’-cap and 3’ poly A tail were confirmed by two separate LC-UV/MS-methods. It was demonstrated that the predominant form of the 5’ terminus is the full-length nucleotide sequence with the 5’-Cap. The higher order structure of BNT162b2 mRNA active substance was characterised in solution using biophysical techniques.

Overall, state-of-the-art methods were applied for physico-chemical characterisation and the results confirmed the expected sequence and quality attributes. It is recommended that the applicant should comprehensively describe the capability of a specific analytical method to detect lower amounts of product related impurity in the presence of the correct form in the active substance. **(REC9)**.

An uncertainty in the characterisation section is that no biological characterisation is presented. In response to questions during the procedure, the applicant has committed to update dossier with the strategy for potency determination and to address relevant functional assays including the in vitro expression (potency) results and results from the analysis of expressed protein size for active substance lot 20Y513C101. It is recommended that the applicant should discuss the results and the assay suitability for a certain method used for biological characterization of protein expression for the active substance **(REC10)**.

As described above, the expressed protein size results are currently not sufficiently confirmed and a specific obligation is laid down in the terms of the MA requiring their adequate characterisation **(SO1).**

Process-related and product-related impurities as well as potential contaminants are described. A number of batches were evaluated for impurities, i.e. clinical, initial emergency supply and PPQ batches from both manufacturing sites.

The sole product-related impurity addressed is double-stranded RNA, derived from the in-vitro transcription reaction. Results from the active substance batches demonstrate that the level of double stranded RNA is low, acceptable and consistent.

In addition to double stranded RNA, there are truncated RNA, also referred to as fragmented species. Truncated RNA is reflected in the AS specification in terms of RNA integrity. However, the characterisation of BNT162b2 AS is currently not found to be complete in relation to a specific parameter. This is especially important considering that the current AS and finished product acceptance criteria allow for a proportion of fragmented species. The Applicant should provide additional data to further characterise the truncated and modified mRNA species present in the finished product. Relevant protein/peptide characterization data for predominant species should be provided **(SO1)**.

Residual DNA template is a process-related impurity derived from the linearised DNA template added to the in-vitro transcription reaction. Residual DNA template is measured as defined in the active substance specification. The levels are controlled by a specification limit which is considered suitably low.

The potential contaminants described in this section are endotoxin and bioburden. Acceptable results are shown for the Proteinase K pool, UF retentate pre recovery, UF-product pool and the active substance, for all batches investigated.

Specification

The active substance specifications contain tests for appearance (clarity, coloration (Ph. Eur.)), pH (Ph. Eur.), content (RNA Concentration) (UV Spectroscopy), Identity of Encoded RNA Sequence (RT-PCR), RNA Integrity (Capillary Gel Electrophoresis), 5'- Cap (RP-HPLC), Poly(A) Tail (ddPCR), Residual DNA Template (qPCR), dsRNA (Immunoblot), Bacterial Endotoxin (Ph. Eur.) and Bioburden (Ph. Eur.).

The proposed specification for active substance is considered acceptable for authorisation with respect to the attributes chosen for routine release testing. During the procedure the specification limits for a number of attributes were tightened in response to questions.

The length of the poly(A) tails in BNT162b2 active substance is important for RNA stability and translational efficiency and even though comparable results have been reported to date, the poly(A) tail length should be included to the active substance release testing **(SO2)**.

The rationale used to establish the acceptance criteria is described in detail and based on a limited data set representative of BNT162b2 active substance manufactured at the intended commercial scale and process. From the available data, mRNA integrity, dsRNA and Poly(A) tail acceptance criteria are considered in relation with batches used in clinical studies and with the demonstrated manufacturing capability and need to be re-assessed and revised as appropriate as further data becomes available **(SO2).**

Potency testing is not included in the control of active substance but instead is performed at the level of finished product release testing. Considering the nature of this product, the approach is endorsed by the CHMP.

Analytical methods

All analytical methods used for testing of the active substance are sufficiently described in the dossier. The following tests are performed in accordance with Ph Eur chapters; clarity (Ph Eur 2.2.1), colour (Ph Eur 2.2.2), pH (Ph Eur 2.2.3), bacterial endotoxins (Ph Eur 2.6.14) and bioburden (Ph Eur 2.6.12).

All non-compendial analytical methods are sufficiently described. These analytical methods were suitably validated against the parameters presented in ICH Q2(R1).

The technical procedure for the quantification of the poly(A) tail is considered, in general, sufficiently described but the suitability of this method for the intended purpose remains to be confirmed **(SO2)**.

Batch analysis

Batch results are presented for active substance batches used for nonclinical toxicology, clinical trials, process performance qualification (PPQ), emergency supply and stability.

In general, the results obtained using the commercial process (Process 2) demonstrate batch to batch consistency with a few exceptions.

Reference materials

The current reference standard is referred to as the Clinical Reference Material (CRM). A stability protocol is provided. The Applicant has agreed to provide additional information such as protocol on preparation and qualification on the future reference material, as requested **(REC12)**.

In future, a two-tiered system for future commercial reference material will be implemented. A primary reference material (PRM) and an initial working reference material (WRM) will be established for the active substance reference material.

Container closure

The information regarding container closure system is acceptable. Compliance with Ph. Eur. has been verified.

Stability

Based on the limited stability data presented a shelf-life at -20 ± 5°C can be approved for the active substance when stored in the commercial container closure system. The stability program is designed to follow ICH guidelines. The test methods used are stability indicating. Data from the sites Andover, Mainz, Rentschler are included.

It is noted that the Applicant states that testing is currently in progress on the clinical batches and the dossier will be updated with data for these batches, as well as any new data available for the primary process validation batches. Thermal cycling studies have been initiated and a minimum of one process validation batch will be subjected to photostability studies at a future date.

Based on the stability data presented a shelf-life at -20 ± 5°C can be approved for the active substance when stored in the commercial container closure system.

2.2.3. Finished Medicinal Product

Description of the product and pharmaceutical development

The BNT162b2 finished product (FP) is supplied as a preservative-free, 5 dose multidose concentrate to be diluted prior to intramuscular injection. The finished product is a sterile dispersion of RNA-containing lipid nanoparticles (LNPs) in aqueous cryoprotectant buffer.

Each vial, containing 0.45 mL of the finished product at pH 6.9 - 7.9 is designed to deliver a total of 5 doses after dilution by addition of 1.8 mL of sterile 0.9% sodium chloride solution to a total volume of 2.25 mL. Each dose contains 30 µg of RNA in 0.3 mL.

The overfill in the vial is required to ensure that the full five doses can be removed from the multi-dose vial after dilution and correctly administered, taking account of potential loss of product during these dilution and administration steps. The justification for the overfill is sufficiently discussed and considered to be acceptable. The applicant development data and finished product testing confirm that 5 doses can be consistently extracted from the vial and delivered after dilution.

The finished product is supplied in a 2 mL glass vial sealed with a bromobutyl rubber stopper and an aluminum seal with flip-off plastic cap.

The full list of excipients is listed above in section 2.2.1; ALC-0315 and ALC-0159 (functional lipids), DSPC and cholesterol (structural lipids), potassium chloride, potassium dihydrogen phosphate, sodium chloride and disodium phosphate dihydrate (buffer components), sucrose (cryoprotectant) and water for injections.

All excipients except the functional lipids ALC-0315 and ALC-0159 and the structural lipid DSPC comply with Ph. Eur. The functional lipid excipients ALC-0315 and ALC-0159, are classified as novel excipients. Both structural lipids DSPC and cholesterol are used in several already approved finished products. A justification was provided for why DSPC is not considered to be a novel excipient. DSPC is used as part of the LNP for the EU approved finished product Onpattro which is administered intravenously in a much higher dose than the intramuscular dose for this product. Additionally; DOPC, a structurally related lipid, is present in finished products approved in the EU for intramuscular administration. It was therefore concluded that the level of information provided for DSPC, is in line with the requirements for a known excipient are sufficient and appropriately justified.

The vial, stopper and seal components are compliant with the appropriate Ph. Eur. monographs for primary containers and closures.

Formulation development

The section on formulation development describes and justifies the chosen formulation and is sufficiently comprehensive.

The formulation development studies of the RNA containing lipid nanoparticles have been thoroughly described. The LNPs consists of four lipids, each has a functional or structural purpose. The formed RNA-containing LNPs are solid particles. Furthermore, the accumulated batch-data to date show consistent manufacture of lipid nanoparticles both with respect to size and polydispersity.

Lipid-related impurities have been identified in the finished product and have been characterized. An investigation has been initiated and is ongoing to assess and review potential root causes. The outcome of the investigation shall be provided (SO2).

Visual particulate matter has occasionally been observed in finished product batches. Characterization data have been presented and the control strategy has been discussed. The data demonstrates that the particles are comprised of components of the finished product formulation. A 100% visual inspection is performed during manufacturing and the automatic inspection system is updated to improve the inspection. Routine release or routine stability data indicate that the propensity of particles to form following storage is low. If particles are observed in the diluted vaccine the vial should be discarded.

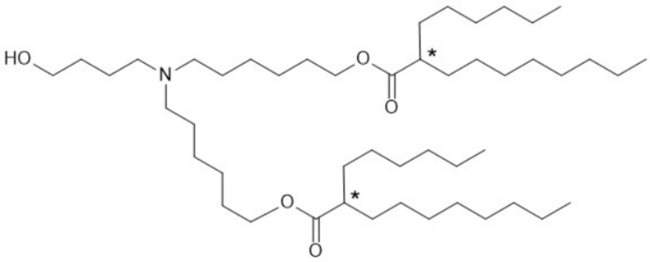
Novel excipients

Two novel excipients are included in the finished product, the cationic lipid ALC-0315 and the PEGylated lipid ALC-0159. Limited information regarding the novel excipients are provided.

ALC-0315 (cationic lipid)

The ALC-0315 novel excipient is a cationic lipid containing a tertiary amine and two ester moieties, ((4-hydroxybutyl)azanediyl)bis(hexane-6,1-diyl)bis(2-hexyldecanoate).

Figure 1 ALC-0315 structure



Asterisks (*) indicate chiral centers.

A brief description of the chemical synthesis is provided. The suppliers are defined in the dossier. A similar manufacturing process is used for ALC-0315 in clinical and commercial finished product batches.

In order to confirm the purity profile and ensure comprehensive quality control and batch-to-batch consistency throughout the lifecycle of the finished product, the applicant should provide additional information about the synthetic process and control strategy for the excipient ALC-0315. (**SO4**)

The proposed specification is considered acceptable based on the available data. However, additional information regarding specifications that should be provided **(SO4)**.

Stability data from one supplier indicate that ALC-0315 is stable when stored at the recommended storage conditions. Additionally, the excipient is stable at room temperature suitable for use in further manufacturing steps. Stability data from one supplier is considered representative for lipid from another supplier.

Lipid related impurities have been observed in some recently manufactured finished product batches, correlated with ALC-0315 lipid batches. The quality of ALC-0315 excipient is considered acceptable based on the available data on condition that specific impurities in the finished product will be further evaluated **(SO2)**.

ALC-0159 (PEGylated lipid)

The ALC-0159 novel excipient is a PEGylated lipid, 2 [(polyethylene glycol)-2000]-N,N-ditetradecylacetamide.

Figure 2 ALC-0159 structure

A brief description of the chemical synthesis is provided.

The suppliers are defined in the dossier. The same supplier was used during development for clinical phase 1, 2 and 3 studies. The same synthetic route was used for ALC-0159 throughout development of the finished product.

In order to confirm the purity profile and ensure comprehensive quality control and batch-to-batch consistency throughout the lifecycle of the finished product, the applicant is requested to provide additional information about the synthetic process and control strategy for the excipient ALC-0159. **(SO5)**

The proposed specification is considered acceptable based on available data. However, in order to improve impurity control strategy and to ensure batch to batch consistency of the finished product, there are additional information regarding specifications that should be provided **(SO5)**.

Stability data indicate that ALC-0159 is stable when stored at the recommended storage conditions.

Manufacturing process development

The development history of the finished product is sufficiently described. The process has been transferred to commercial facilities for manufacture of later clinical materials, emergency supply and commercial supply. A table on finished product lot genealogy and usage has been provided.

The applicant states that comparability is demonstrated in a stepwise approach through a combination of release testing and extended characterization methods. It is agreed that comparability was sufficiently demonstrated with only small differences noted.

During the present regulatory procedure, release testing results of a number of recently manufactured GMP-batches was presented. The release data for the GMP-batches are compared to the clinical batches as well as to the results of the emergency supply lots. It is agreed that the differences noted are few and minor for all tests included in the FP specification and that comparability has been sufficiently demonstrated subject to the specific obligations further described, for the attributes tested and given the pandemic situation. In addition, the comparison will be further extended with additional characterization testing on future batches of finished product. The applicant has confirmed that testing will be performed according to the agreed finished product comparability testing protocol and the results will be submitted in the frame of a specific obligation (**SO3**).

A concurrent validation approach will be used due to the urgent need for this product and the pandemic situation. The rationale for this approach has been documented and is agreed. This concurrent approach requires interim reports to be documented for each individual validation run. An overall report per site will be compiled that summarises all evaluations and contains a comparability assessment of the data of all batches manufactured. Finally, a concluding report linked to this plan will be written that summarises all findings from the different validation reports. Process validation (PPQ) for commercial scale batches were initiated, and a summary report from one PPQ validation batch was provided.

In summary, given that an acceptable validation program at the commercial facility has been established, and a summary report from one PPQ validation batch was provided, the information on process validation is considered acceptable subject to the agreed specific obligation that the MAH should provide additional validation data (**SO3**).

The development of the manufacturing process is extensively described, and critical process parameters are defined. Process characterisation studies using scale-down models of individual unit operations, were performed.

Overall control strategy was presented but some parameters and ranges may be updated after PPQ and additional characterization studies completed. As for assessment of overall control strategy, a complete set of data and information is needed, this document will be assessed when finalised. A time-plan for the provision of the final data set has been agreed with the applicant **(SO3)**.

The analytical testing strategy of finished product has changed throughout the development and these changes have been described. Bridging studies have been performed for analytical tests that have been changed or replaced (subvisible particles, identity of encoded RNA sequence and RNA integrity). This is found acceptable.

Container closure system

The development of the container closure system is sufficiently presented. The primary packaging is composed of glass vial and rubber stopper and are compliant with the compendial requirements of Ph. Eur.

Controlled extraction studies have been performed on the bromobutyl rubber stopper. The applicant will provide the updated results from the leachables study for assessment. (**REC13**)

Microbiological attributes

Container closure integrity testing has been performed to demonstrate that the 2 mL container closure presentation is integral.

In order to improve the control strategy, the MAH should provide validation results of alternative sterility test i.e. rapid sterility test for assessment before implementation (**REC14**).

Compatibility

The studies described have been performed to assess physicochemical stability of the FP after dilution with 0.9% sodium chloride solution in the original glass vial as well with commonly used commercially available administration components and using worst-case conditions for dosage and administration in the clinical setting. The thawed hold time (in-use period) of undiluted finished product has been defined as 5 days at 2-8 °C and 2 hours at up to 30 °C.

Results presented support physicochemical stability of FP diluted in 0.9% sodium chloride solution for up to 24 hours at ambient or refrigerated temperatures (2-30°C) following an in-use thawed hold time of up to 5 days at 2-8 °C and 2 hours at 30 °C.

Compatibility with dosing components (syringes and needles) has been established for up to 6 hours. Furthermore, a microbiological in-use hold time study has been performed by a challenge test including five compendial micro-organisms. No significant growth (>0.5log10 from the start-point) was observed for any of the microorganisms within 12 hours of inoculation with storage at 20-25°C of diluted FP in 0.9% sodium chloride solution. Therefore, based on the results from the microbiological in-use hold time study, the proposed in-use period for up to 6 hours at ambient temperatures is agreed, as reflected in the product information. Furthermore, it is also stated by the applicant that the in-use period is in alignment with the WHO policy on the use of opened multi-dose vaccine vials (WHO Policy Statement: Multi-dose vial policy (MDVP) – handling of multi-dose vaccine vials after opening, rev 2014).

The compatibility of finished product is acceptably demonstrated by the dilution and administration simulation studies performed.

Manufacture of the product and process controls

The finished product is batch released by Pfizer Manufacturing Belgium NV, Puurs, Belgium or BioNTech Manufacturing GmbH, Mainz, Germany. The GMP status of the manufacturing and testing sites of the finished product have been confirmed.

The finished product manufacturing process includes the following main steps: active substance thawing and dilution, LNP formation and stabilisation, buffer exchange, concentration and filtration, concentration adjustment and addition of cryoprotectant, sterile filtration, aseptic filling, visual inspection, labelling, freezing and storage. Critical manufacturing steps are discussed, and relevant in-process controls are applied.

Dossier should be updated to provide more details on increase batch size including range number of AS bag and batches used, configuration of filters filter surfaces used and process controls (**REC14**). The absence of a test for residuals is considered acceptable.

Shipping validation

This section gives a summary of the qualification of the shipping process for transport of BNT162b2 finished product by passive thermal shipping containers for air and road shipments at temperature conditions of -90 to -60 °C from the finished product manufacturing and packaging site to dosing sites in the EU.

Short periods of time outside of the intended routine shipping condition of -90 to -60 °C during transport and at distribution sites have been defined.

The shipping temperature range of -90 to -60 °C is based on available stability data.

One thaw and refreeze cycle is allowed during transportation. Time during transportation out of the intended storage and shipping temperature range (-90 to -60 °C) without thaw is allowed for specified times and conditions for multiple transfers and redistribution during shipping with subsequent refreezing to -90 to -60 °C between transfers. The temperature excursion allowances are supported by data.

The selected shipping methods include shipping containers designed to maintain product temperature through a combination of insulation and dry ice. The applicant has prior experience with these passive thermal conveyances and has demonstrated that they maintain the -90 to -60 °C temperature range during product shipments, including minor shipping delays and short exposures to extreme temperatures occasionally observed during shipping and handling.

All shipments are continuously monitored using temperature data loggers.

The overall qualification strategy considered both thermal and mechanical aspects of shipping in passive thermal conveyance, supported by operational qualification and performance qualification testing. A summary of the shipping qualification strategy has been provided.

For the passive thermal conveyance, the qualification is focused on the ability of the passive system to maintain the required temperatures with specified phase change materials or dry ice when exposed to ambient temperature profiles for worst-case season. These studies are carried out in laboratory chambers to simulate the summer as worst-case ambient profiles.

A simulated distribution study demonstrated finished product and package integrity after exposure to simulated distribution hazard conditions, following the durations outlined in the worst-case extended transport lanes.

Results of thermal qualification have met specified acceptance criteria and support shipments of BNT162b2 finished product using the passive thermal conveyance shipping containers either directly or via qualified distribution centres. Passive thermal conveyance performance qualification and the simulated shipping study finished product impact testing have been performed to complete shipping qualification assessing both thermal and mechanical aspects of shipping.

Process parameters for storage and shipping are found acceptable.

Media fills

Media fills have been performed for the filling line to validate the aseptic filling process and were run in accordance to guidelines. Results have been provided from three consecutive simulation studies and gave satisfactory results without any contaminated units. Results for the media fill cover the maximum process time for the manufacturing of finished product and simulate worst-case manufacturing conditions. The media fill validation demonstrated that aseptic conditions are maintained during the filling process. For the filling line, the maximum time will be established upon completion of media fill qualification studies. This is found acceptable.

Verification of in-process test methods

Data on verification of in-process test methods was pending at the time of the present regulatory procedure and should be provided during Q2 2021 (**REC15**).

Hold times

Hold times have been established. It is noted that any change of this section needs to be submitted to the Agency via a variation application.

Process validation plan

A FP process validation plan has been provided.

A concurrent validation approach will be used due to the urgent need for this product and the pandemic situation. The rationale for this approach has been documented. This concurrent approach requires interim reports to be documented for each individual validation run. An overall report per site will be compiled that summarises all evaluations and contains a comparability assessment of the data of all batches manufactured. Finally, a concluding report linked to this plan will be written that summarises all findings from the different validation reports.

It is described in the dossier that commercial scale PPQ-batches will be manufactured during Dec 2020 to Jan 2021 and the applicant has provided a process validation plan. In order to confirm the consistency of the finished product manufacturing process, the applicant should provide additional validation data, by March 2021. (**SO3**)

Filter validation

Acceptable information has been provided during the procedure for filter validation on the filters used for sterile filtration, describing the material, pore size and surface area. All study results met the predetermined acceptance criteria and the studies for microbial retention, membrane compatibility, extractable substances and integrity test determination have shown that the filters are appropriate for sterile filtration of the finished product. In addition, the applicant has clarified that the filter used for bioburden reduction is identical to the filters used for sterile filtration.

The MAH should provide the results for assessment from the filter validation as soon as they are available (**REC23**).

Control of excipients

ALC-0315 and ALC-0159 are novel excipients, not previously used in an approved finished product within EU. Additional information is provided separately in Section A.3 of the dossier.

DSPC is a non-compendial excipient sufficiently controlled by an in-house specification.

Cholesterol is sufficiently controlled according to the Ph. Eur. monograph with additional tests for residual solvents and microbial contamination.

The other excipients (sucrose, sodium chloride, potassium chloride, disodium phosphate dihydrate, potassium dihydrogen phosphate and water for injection) are controlled according to respective Ph. Eur. monograph.

The processing aids ethanol and citrate buffer are controlled according to Ph. Eur. standards and for HEPES and EDTA, reference is made to the active substance.

Product specification

The release and stability testing specifications for BNT162b2 finished product include tests for Appearance (Visual), Appearance (Visible Particulates), Subvisible Particles (Ph. Eur.), pH (Ph. Eur.), Osmolality (Osmometry), LNP Size (Dynamic Light Scattering), LNP Polydispersity (Dynamic Light Scattering), RNA Encapsulation (Fluorescence assay), RNA content (Fluorescence assay), ALC-0315 content (HPLC-CAD), ALC-0159 content (HPLC-CAD), DSPC content (HPLC-CAD), Cholesterol content (HPLC-CAD), extractable volume (Ph. Eur.), Lipid identities (HPLC-CAD), Identity of encoded RNA sequence (RT-PCR), Potency / in Vitro Expression (Cell-based flow cytometry), RNA Integrity (Capillary Gel Electrophoresis), Bacterial Endotoxin (Ph. Eur.), Sterility (Ph. Eur.) and Container Closure Integrity (Dye incursion). For all quality attributes tested on stability except for RNA integrity, the acceptance criteria for release and stability testing throughout shelf life are the same.

The specifications document for finished product in section 3.2.P.5.1 of the dossier includes a comprehensive panel of relevant tests along with corresponding acceptance criteria.

With the exception of osmolality, volume of injections in containers, HPLC-CAD (lipid identities) and RT-PCR (identity of encoded RNA sequence), which are performed only at FP release, all other analytical procedures are conducted at release and stability studies for finished product. It is stated by the applicant that the acceptance criteria used for stability during shelf-life will be the same as the acceptance criteria used for lot release.

Several questions in relation to the acceptance criteria in the FP specifications were raised during the procedure (i.e. the LNP size, polydispersity, RNA encapsulation, in-vitro expression and RNA integrity). The acceptance criteria were tightened.

For potency, RNA integrity, RNA encapsulation, lipid content and polydispersity index, the acceptance criteria will be re-assessed during Q2 2021 in order to ensure a consistent product quality by providing additional information to enhance the control strategy. This is found acceptable subject to a specific obligation. (**SO2**)

The vial contains an overfill in order to ensure that the full required volume (5 doses) can be delivered following dilution and administration in line with the product information. The finished product specification includes a test to confirm the extractable volume from the vial provides 5 doses. During the procedure the applicant proposed to update the product information and instructions for use to indicate that up to 6 doses can be delivered from the vial. This proposed change to the product information was not considered acceptable as no supporting data were provided to demonstrate that 6 doses can be consistently extracted. In order to support such a change in the product information, a variation should be submitted to update the specification limits for extractable volume, supported by appropriate pharmaceutical development data to support the claim of 6 doses (**REC21**).

A risk evaluation regarding the risk of N-nitrosamines impurities was provided concluding that there is no risk of the presence of nitrosamines in the finished product taking into account the active substance, the finished product formulation and primary packaging. The risk assessment is considered acceptable.

It is recommended that a risk assessment should be provided with respect to the potential presence of elemental impurities in the active product based on the general principles outlined in Section 5.1 of ICH Q3D **(REC17)**.

A question was raised during the procedure since no information and discussion was provided in the dossier on lipid-related impurities originating from the degradation of the LNP. It is argued by the applicant that with respect to potential lipid-related impurities originating from the degradation of LNPs, no degradation of the LNP FP has been observed in the stability studies at the recommended storage temperature (-70 to -90 °C) for the LNP as shown by specifications for size and polydispersity, RNA encapsulation, RNA and lipid content and RNA integrity quality attributes. This is acknowledged. In addition, further evaluation of lipid-related impurities in the finished product should be performed and the results submitted and discussed in the frame of a specific obligation (**SO2**).

Analytical methods

The analytical methods used have been adequately described and (non-compendial methods) appropriately validated in accordance with ICH guidelines.

Batch analysis

The dossier includes release testing results of four recently manufactured GMP-batches. These finished product GMP batches were manufactured at the commercial FP manufacturing site. The release data for these GMP-batches are compared to min-max ranges of the small-scale clinical batches as well as to the results of the emergency supply lots. It is agreed that the differences noted are few and minor for all tests included in the FP specification. Therefore, it can be concluded that comparability has been sufficiently demonstrated for the attributes tested given the pandemic situation and considering that further data is to be provided in the frame of a specific obligation. In addition, the comparison will be further extended with additional characterization testing on future PPQ-batches of finished product. The applicant has confirmed that testing will be performed according to the finished product comparability testing protocol. and the results will be provided in the frame of specific obligation **(SO3)**.

Reference materials

The finished product reference materials is the same as for active substance.

Stability of the product

A shelf-life of 6 months for the finished product is proposed when stored at the recommended storage condition of -90°C to -60°C.

The applicant has provided stability results up to 6 months at -80 to -60°C of one clinical batch and up to 6 months of a non-clinical batch of finished product. Two weeks data are also provided for two emergency supply under recommended storage conditions. In addition, there are newly initiated stability studies on the recently manufactured GMP-batches as well as plans to initiate stability studies on the future PPQ-batches.

Stability data have also been provided at accelerated (-40°C to +5°C) and stressed (+25°C to +30°C) storage conditions.

The stability studies are performed in accordance with ICH Q5C (Quality of biotechnological products: Stability testing of biotechnological/biological products) and the same or representative container-closure system are used in these stability studies as will be used for commercial batches. The test methods used are stability indicating.

Overall, the presented stability data indicate no signs of degradation, significant trends or changes in terms of quality at the recommended storage condition (-90 to -60°C).

The applicant has provided updated reports from the ongoing stability studies and the presented data are considered sufficient and in support of the shelf-life claim since comparability has been sufficiently demonstrated between commercial scale GMP batches and the small-scale clinical batches.

In addition, the initial in-use period for the thawed, undiluted vial is 5 days at 2-8°C followed by storage at up to 30°C for not more than 2 hours. This is found acceptable.

Chemical and physical in-use stability has also been demonstrated for 6 hours at 2ºC to 30ºC after dilution in sodium chloride 9 mg/mL (0.9%) solution for injection.

It is described that the future PPQ-lots will be enrolled in the stability program and the stability protocol has been defined in the dossier. This is acceptable; however, the applicant should commit to provide the 6 months stability data for the PPQ-batches for assessment as soon as they are available. (**REC20**). Notwithstanding requests for further stability updates, in accordance with EU GMP guidelines, any confirmed out-of-specification result, or significant negative trend, should be reported to the Rapporteur and EMA.

It has been clarified by the applicant that results on photostability testing studies will be provided for assessment (**REC19**).

It is recommended that the applicant should investigate the opportunities for an increased temperature at long term storage conditions for the finished product from -70°C to -20°C. In addition, the applicant should investigate the possibility to prolong the in-use storage time (before dilution) of 5 days at 2-8°C as well as the possibilities to extend the claims for transport conditions at 2-8°C **(REC22)**.

A shelf-life of 6 months for the finished product at -90 to -60°C is accepted.

Adventitious agents

Adventitious agents' safety evaluation has been provided for the AS manufacturing sites and for the finished product manufacturing site.

Reagents used in active substance manufacturing and in the establishment of the MCB and WCB are the only materials of animal origin used in the manufacture of BNT162b2. The applicant has identified contamination of the product by Transmissible Spongiform Encephalopathy (TSE) agents as the main theoretical risk associated with these ingredients and it is deemed of minimal risk.

Additional clarifications were requested and provided for a number of other materials.

Sufficient details on the aseptic validation filling and media fills have been provided. Furthermore, adequate testing for bioburden and endotoxin is performed at different stages of the manufacturing process. Therefore, no additional concerns are raised.

2.2.4. Discussion on chemical, pharmaceutical and biological aspects

During the procedure, a number of issues were highlighted relating to the GMP status of the manufacture of the active substance and of the testing sites of the finished product for the purpose of batch release, the comparability between clinical and commercial material and the absence of validation data on finished product manufactured at the commercial site. These issues were classified as Major Objections (MOs).

After further information was obtained from the sites and inspectors, questions regarding the manufacturing were addressed and manufacturing authorisations and GMP certificates are in place for all active substance and finished product manufacturing and testing sites.

Some of the proposed sites for batch control testing are currently located in the USA. The following time-limited derogation has been introduced as a condition to the MA:

'*In view of the declared Public Health Emergency of International Concern and in order to ensure early supply this medicinal product is subject to a time-limited exemption allowing reliance on batch control testing conducted in the registered site(s) that are located in a third country. This exemption ceases to be valid on 31 August 2021. Implementation of EU based batch control arrangements, including the necessary variations to the terms of the marketing authorisation, has to be completed by the 31 August 2021 at the latest, in line with the agreed plan for this transfer of testing. Progress reports have to be submitted on 31 March 2021 and included in the annual renewal application'.*

Additional data have been submitted by the applicant during the procedure in response to the other MOs and other questions raised.

Having considered the emergency situation and the quality documentation provided, the CHMP imposed some specific obligations (SOs) with clearly defined due dates (refer to Conclusions for details). In addition, the CHMP adopted some Recommendations (RECs) to be addressed by the Applicant.

In addition, it should be ensured that, in accordance with Annex I of Directive 2001/83/EC and Article 16 of Regulation (EC) No 726/2004, the active substance and finished product are manufactured and controlled by means of processes and methods in compliance with the latest state of scientific and technical progress. As a consequence, the manufacturing processes and controls (including the specifications) shall be designed to ensure product consistency and a product quality of at least shown to be safe and efficacious in clinical trials and shall introduce any subsequent changes to their manufacturing process and controls as needed.

Active substance

Overall, the information provided is satisfactory. However, certain information is still pending due to the very short time frame of product development and will either be updated in the dossier imminently or further addressed in specific obligations and other post-approval measures.

Information on the manufacturing process and process controls for the manufacturing sites Andover and BNT Mainz & Rentschler have been provided and are considered satisfactory.

Two active substance processes have been used during the development; Process 1 and 2. The major changes between AS Process 1 and 2 are: increased process scale, DNA template changed from a PCR template to linearised plasmid DNA, magnetic bead purification replaced with proteinase K digestion and UFDF steps. Based on the differences observed between batches manufactured by active substance Process 1 and 2 for the CQA mRNA integrity and lack of characterisation data, a MO was raised regarding comparability, characterisation and clinical qualification of the one proposed acceptance criteria. Biological characterisation of the active substance was limited, and additional data and discussion were requested to address functionality. Additional characterisation data for the active substance are to be provided to confirm the identities of the observed Western Blot (WB) bands obtained by the *in vitro* expression assay **(SO1).**

Truncated RNA species are regarded as product-related impurities and can be expected due to the principle of the in-vitro transcription reaction (i.e. directional polymerase activity) and (theoretical) hydrolysis during manufacturing. Analysis of RNase treated samples showed that all species detected by the capillary gel electrophoresis (CGE)-based method are composed of RNA. Manufacturing consistency with respect to fragmented species has been sufficiently demonstrated.

There were some differences in truncated RNA species level, however further analyses revealed a comparable overall fragmentation profile among Process 1 and Process 2 active substance batches. Additionally, oligonucleotide mapping data demonstrated no significant differences observed between Process 1 and Process 2 active substance batches.

The company does not expect truncated transcripts formulated in the finished product to pose a safety or efficacy concern, as in their view no protein expression is expected from truncated transcripts. Further, clinical trials with process 1 material have not revealed major safety concerns to date. Truncated BNT162b2 RNA species lacking either the 5’ cap or the poly(A) tail are expected to be rapidly targeted for degradation in the cytoplasm or would show a decrease or loss of translation efficiency. Preliminary characterization data on isolated fragment species suggest that fragment species predominantly include the 5’-cap but lack the poly(A) tail, supporting the hypothesis that most fragments would arise from premature termination in the IVT reaction.

However, as the overall characterisation of the truncated species is still limited, additional analysis of truncated species, additional translated protein characterisation, additional characterisation of lipid-related impurities and potential lipid-RNA species should be provided to support that they are not impacting clinical performance in terms of safety and/or efficacy. The current specification allows for a certain level of truncated mRNA species to be present however data from recent batches have shown levels of truncated species below that level. No related safety issues have been identified in the clinical studies thus far in subjects who received vaccine containing up to a certain level of truncated species. Therefore, the current specification is considered acceptable subject to the submission of additional data in the frame of a specific obligation (**SO1**).

Based on available data, the proposed specification for active substance is acceptable with respect to the attributes chosen for routine release testing. However, the length of the poly(A) tails in BNT162b2 active substance is critical for RNA stability and translational efficiency and therefore should be introduced in active substance release testing in the frame of a specific obligation (**SO2**). Moreover, the active substance specification acceptance limits should be re-assessed and revised as appropriate, as further data become available from ongoing clinical trials and in line with manufacturing process capability (**SO2**).

It is noted that the Applicant states that testing is currently in progress on the clinical batches and data for these batches, as well as any new data available for the primary process validation batches, will be provided. Based on the limited stability data presented, a shelf-life is approved for the active substance.

Finished product

The finished product is a preservative-free, multi-dose concentrate to be diluted for intramuscular injection, intended for 5 doses. The finished product is a sterile dispersion of RNA-containing lipid nanoparticles (LNPs) in aqueous cryoprotectant buffer.

The formulation development studies of the RNA containing lipid nanoparticles have been thoroughly described including studies that were performed with available active substance, representative of the mRNA platform and included in the finished product.

The development of the manufacturing process is extensively described, and critical process parameters are defined.

The manufacturing process includes lipid nanoparticle fabrication and bulk finished product formulation followed by fill and finish, and the process has been acceptably described.

Comparability between the commercial finished product and the clinical finished product has been sufficiently demonstrated for the attributes tested and will be subject to a specific obligation.

Limited data on the finished product batches manufactured at the commercial facility (entire manufacturing process at the commercial site Pfizer, Puurs, at commercial scale, active substance from process 2) were presented. A process validation plan for PPQ lots has been provided.

A concurrent validation approach will be used due to the urgent need for this product and the pandemic situation. The rationale for this approach has been documented. This concurrent approach requires interim reports to be documented for each individual validation run. An overall report per site will be compiled that summarises all evaluations and contains a comparability assessment of the data of all batches manufactured. Finally, a concluding report linked to this plan will be written that summarises all findings from the different validation reports.

Further data was requested in order to conclude on the consistency of finished product manufacturing, to assure comparability between the commercial product with the product used in clinical trials, and to support the claimed finished product shelf-life and storage conditions. A process validation plan for PPQ lots has been provided. Process validation (PPQ) for commercial scale batches were initiated, and a summary report from one PPQ validation batch was provided.

In summary, given that an acceptable validation program, also comprising the commercial facility at Puurs, Belgium, has been established, and a summary report from one PPQ validation batch was provided, the information on process validation is considered acceptable subject to the agreed specific obligation that the MAH should provide additional validation data **(SO3).**

The specifications for finished product include a comprehensive panel of relevant tests along with corresponding acceptance criteria. Several issues in relation to the acceptance criteria in the finished product specifications were raised, i.e. the LNP size, polydispersity, RNA encapsulation, in-vitro expression and RNA integrity. Whilst FP specifications were subsequently amended and overall found to be acceptable, the acceptance limits should be re-assessed, and revised as appropriate, as further data becomes available from ongoing clinical trials and in line with manufacturing process capability (**SO2**).

Two novel excipients are included in the LNP. Complete information is not provided for both the cationic lipid ALC-0315 and the PEGylated lipid ALC-0159. In order to assure comprehensive control throughout the lifecycle of the finished product and to ensure batch to batch consistency, further information needs to be submitted regarding the synthetic process and control strategy in line with specific obligations **(SO4, SO5).**

Lipid-related impurities have been observed in some recently manufactured finished product batches. For the batches with lipid-related impurities the existing quality control parameters including RNA integrity remain unchanged.

Considering the above and the emergency situation, the characterisation of the active substance and finished product is considered acceptable, and the proposed specifications for RNA Integrity and 5′-Cap are considered to be scientifically justified and acceptable. Nevertheless, additional data to complete the characterisation of the active substance and finished product and additional clinical data from batches currently in use in ongoing clinical studies, are considered important to confirm the clinical qualification of these specifications. These data are requested to be provided as specific obligations to the applied conditional marketing authorisation **(SO1, SO2)**.

Efficacy, safety and immunogenicity was demonstrated using clinical batches of vaccine from Process 1. The commercial batches are produced using a different process (Process 2), and the comparability of these processes relies on demonstration of comparable biological, chemical and physical characteristics of the active substance and finished product.

The characterisation and control of active substance and finished product are limited in relation to critical quality attributes and impurities. The suitability of the analytical methods used for control of potency and poly(A) tail have not been fully demonstrated.

Data demonstrate the presence of significant amounts of truncated/modified forms of mRNA at somewhat higher levels in the batches manufactured with the commercial process as compared to material used in clinical trials. These forms are poorly characterised, and the limited data provided for protein expression do not fully address the uncertainties relating to the risk of translating proteins/peptides other than the intended spike protein.

The control strategy for active substance and finished product is important to guarantee acceptable quality and ensure batch to batch consistency of the finished product. Regarding the proposed control strategy, questions were raised both with regard to the suitability of the test methods used and the acceptance criteria for some tests.

Based on the above, the following uncertainties are considered to be of importance for the benefit-risk assessment:

- Truncated and modified RNA are present as impurities. Considering the low dose of mRNA (30 µg), the impurities are not considered a safety issue based on general toxicological principles. However, when present in the cell there is a possibility that aberrant proteins will be expressed with possibilities for unwanted immunological events. The risk of this occurring is considered low based on the following observations and considerations:
  - Such impurities were present in the vaccine used in the Phase 3 clinical trials with an acceptable safety profile. Although the lack of characterisation hinders a full comparability evaluation there is no indication that there would be important qualitative differences in the nature of these impurities.
  - The high levels of these impurities reflect the instability of RNA resulting in generation of RNA fragments both in the transcription step and thereafter. Based on electrophoretic data it appears that there is a diverse set of fragments. Although not confirmed, it is unlikely that these RNA molecules to a large extent would be mRNA molecules with intact 5′-cap and 3′-polyA.
  - The level of any individual aberrant mRNA species would in any way be magnitudes lower than the level of the intact mRNA and this would be mirrored by the level of protein expression. The amount of the protein would be expected to be too low to elicit an immune response. The spike protein is a highly immunogenic protein and immunodominance would also ascertain that the immune response to the aberrant protein would be non-significant.
- Lipid related impurities were observed in recently produced finished product batches. Based on the low dose (30 µg mRNA) it is considered that the amounts of these impurities are too low to be of toxicological significance.

2.2.5. Conclusions on the chemical, pharmaceutical and biological aspects

The quality of this medicinal product, submitted in the emergency context of the current (COVID-19) pandemic, is considered to be sufficiently consistent and acceptable subject to the specific obligations abovementioned.

In general, physicochemical and biological aspects relevant to the clinical performance of the product have been investigated and are controlled in an acceptable way. While the characterisation data still need to be completed, the results of tests carried out indicate consistency of product quality characteristics, and these in turn lead to the conclusion that from a quality perspective the product is expected to have a satisfactory clinical performance.

The submitted information indicate that currently manufactured product batches are of a quality that is appropriate and sufficiently comparable to that of clinical development batches. However, to ensure that the quality of future batches will also remain appropriate and comparable to that of clinical development batches over the life cycle of the medicinal product a number of issues are expected to be addressed though fulfilment of specific obligations, within defined time frames.

The CHMP has identified the following specific obligations to address the identified quality development issues that may have a potential impact on the safe and effective use of the medicinal product, and which therefore are needed to achieve comprehensive pharmaceutical (quality) data and controls for the product. The specific points that need to be addressed in order to fulfil the imposed specific obligations are detailed below.

In addition, and in accordance with Article 16 of regulation (EC) No 726/2004, the MAH shall inform the Agency of any information which might influence the quality of the medicinal product concerned, such as any necessary tightening of the finished product specifications earlier than July 2021. This is also related to the general obligation to vary the terms of the marketing authorisation to take into account the technical and scientific progress and enable the medicinal product to be manufactured and checked by means of generally accepted scientific methods.

In the context of the conditional marketing authorisation, the applicant should fulfil the following specific obligations (SOs):

- ☒ SO1: In order to complete the characterisation of the active substance and finished product, the MAH should provide additional data. **Due date: July 2021. Interim reports: March 2021.**
- ☒ SO2: In order to ensure consistent product quality, the MAH should provide additional information to enhance the control strategy, including the active substance and finished product specifications. **Due date: July 2021. Interim reports: March 2021.**
- ☒ SO3: In order to confirm the consistency of the finished product manufacturing process, the MAH should provide additional validation data. **Due date: March 2021.**
- ☒ SO4: In order to confirm the purity profile and ensure comprehensive quality control and batch-to-batch consistency throughout the lifecycle of the finished product, the MAH should provide additional information about the synthetic process and control strategy for the excipient ALC-0315. **Due date: July 2021, Interim reports: January 2021, April 2021.**
- ☒ SO5: In order to confirm the purity profile and ensure comprehensive quality control and batch-to-batch consistency throughout the lifecycle of the finished product, the MAH should provide additional information about the synthetic process and control strategy for the excipient ALC-0159. **Due date: July 2021, Interim reports: January 2021, April 2021.**

As regards SO1, the following data are requested in order to complete the information on the active substance and finished product characterisation.

a) Additional data is to be provided to further characterise the truncated and modified mRNA species present in the finished product. Data are expected to cover batches used in clinical trials (for which the characterisation data could be available earlier) and the PPQ batches. These data should address results from ion pairing RP-HPLC addressing 5’cap levels and presence of the poly(A) tail. These data should further address the potential for translation into truncated S1S2 proteins/peptides or other proteins/peptides. Relevant protein/peptide characterization data for predominant species should be provided. Any homology between translated proteins (other than the intended spike protein) and human proteins that may, due to molecular mimicry, potentially cause an autoimmune process should be evaluated. **Due date: July 2021. Interim reports: March 2021, and on a monthly basis.**

b) The analysis of the main peak of the RNA integrity test representing the full-length RNA, should be also undertaken addressing 5'cap levels and presence of the poly (A) tail. **Due date: July 2021. Interim report: March 2021**

c) Additional data for the active substance are to be provided to confirm the identities of the observed Western Blot (WB) bands obtained by the *in vitro* expression assay. Protein heterogeneity, resulting in broad bands on the WB and uncertainties in the theoretical intact molecular weight of the spike protein, is assumed to be due to glycosylation. Therefore, to further confirm protein identities, enzymatic deglycosylation of the expressed proteins followed by WB analysis should be performed. Correlation with the calculated molecular weights of the intact S1S2 protein should be demonstrated. **Due date: July 2021. Interim report: March 2021**

As regards SO2, the following data are requested to be provided in order to ensure a comprehensive control strategy, including active substance and finished product specifications:

a) The active substance and finished product specifications acceptance limits, should be re-assessed and revised as appropriate, as further data becomes available from ongoing clinical trials and in line with manufacturing process capability and stability data of the product. Comprehensive data should be provided comprising batch analyses of a suitable number of commercial batches as well as analyses of batches that have been used in the (ongoing) clinical trials. **Due date: July 2021, Interim reports March 2021, and on a monthly basis.**

b) Poly(A) tail length is considered a critical attribute, which should be controlled on each batch, even though comparable results were obtained until now. An active substance specification to control poly(A) length should be introduced. A suitable method should be developed and appropriate acceptance criteria should be set. **Due date: July 2021, Interim reports: March 2021**

c) The poly(A) tail percentage is considered a critical attribute, but uncertainties remain on the suitability of the method. Additional data should be provided to support the suitability of the method used for %poly(A) tail or an alternative suitable assay should be developed and introduced. The %poly(A) tail should be characterised following any future active substance process changes. **Due date: July 2021, Interim reports: March 2021**

d) Since mRNA integrity and polydispersity are CQAs for the efficacy of the medicinal product, the finished product acceptance criteria for these parameters should be revised as further data becomes available from ongoing clinical trials and in line with manufacturing process capability. **Due date: July 2021, Interim reports: March 2021.**

e) Additional data should be provided to support the suitability of the method used for potency determination or an alternative suitable assay for this purpose should be developed and introduced. Then the finished product acceptance criteria for potency should be revised accordingly. **Due date: July 2021, Interim reports: March 2021**

f) Lipid-related impurities should be further evaluated. An appropriate control strategy should be introduced, suitably justified and provided for assessment during Q2 2021. **Due date: July**

2021, Interim reports (LMS content in commercial FP batches, investigation results): March 2021, and on a monthly basis.

As regards SO3, the following data are requested to be provided in order to ensure batch to batch consistency and to complete the information on process validation of the finished product manufacturing process.

a) Full commercial scale finished product PPQ-batches will be manufactured at the commercial facility Pfizer Puurs, Belgium. The applicant should provide the summary report on the completed commercial scale process validation activities. **Due date: March 2021.**

b) The applicant should perform testing of future process validation-batches of finished product according to the extended comparability testing protocol and the results should be provided for assessment. **Due date: March 2021.**

As regards SO4, the data are requested to be provided regarding the synthetic process and control strategy for the excipient ALC-0315 in order to improve the impurity control strategy, assure comprehensive quality control and batch-to-batch consistency throughout the lifecycle of the finished product.

a) A detailed description of the chemical synthesis of ALC-0315 (e.g. information on reagents and process conditions) should be provided. **Due date: January 2021**

b) Differences in the manufacturing process between two suppliers should be described and possible impact on impurity profile should be discussed **by July 2021. Interim report: January 2021**

c) Information and justification of quality control of starting materials (e.g. general synthetic route, supplier and specifications) and solvents should be provided. **Due date: July 2021, Interim report: January 2021**

d) Information and justification on critical steps and intermediates (including specifications) should be provided. **Due date: July 2021, Interim report: January 2021**

e) Specified impurities should be further evaluated and appropriate specification limits for individual impurities should be included when more data are available. Acceptance criteria for specified and un-specified impurities should be added to the specification for ALC-0315 and should also be evaluated during stability studies. **Due date: July 2021, Interim report: April 2021**

f) The specification limit for total impurities should be re-evaluated as more batch data becomes available and revised, as appropriate. **Due date: July 2021**

g) The specification limit for assay should be tightened based on the provided batch data to improve the quality control strategy of the finished product. **Due date: July 2021**

h) Detailed method validation reports for assay, impurities, and residual solvents for ALC-0315 should be provided. **Due date: July 2021**

i) Results of stability studies in accordance with ICH guidelines should be provided. **Due date: July 2021, Interim report: April 2021**

As regards SO5, the following data is requested to be provided regarding the synthetic process and control strategy for ALC-0159 in order to improve impurity control strategy, assure comprehensive control and batch-to-batch consistency throughout the lifecycle of the active product.

a) A detailed description of the chemical synthesis of ALC-0159 (e.g. information on reagents and process conditions) should be provided. **Due date: January 2021**

b) Information and quality control of starting materials (e.g. general synthetic route, supplier and specifications) and solvents should be provided. Relevant acceptance criteria for molecular weight and polydispersity should be included in the specification for the starting material carboxy-MPEG. **Due date: July 2021, Interim report: January 2021**

c) Information and justification of critical steps and intermediates (including specifications) should be provided. **Due date: July 2021, Interim report: January 2021**

d) The specification limit for assay should be tightened based on batch data in order to provide a more stringent quality control of the finished product. **Due date: July 2021, Interim report: April 2021**

e) Specified impurities should be further evaluated and appropriate specification limits for individual impurities should be included when more data are available. Acceptance criteria for specified and un-specified impurities should be added to the specification for ALC-0159 and should also be evaluated during stability studies. **Due date: July 2021, Interim report: April 2021**

f) The specification limit for total impurities should be re-evaluated as more batch data are available and revised, as appropriate. **Due date: July 2021**

g) Acceptance criteria for tetrahydrofuran should be added to the specification for ALC-0159, unless otherwise justified, as it is included as a solvent in step 2 of the synthesis. **Due date: January 2021**

h) Detailed method validation reports for assay, impurities and residual solvents for ALC-0159 should be provided. **Due date: July 2021, Interim report: April 2021**

i) Results of stability studies in accordance with ICH guidelines should be provided. **Due date: July 2021, Interim report: April 2021**

2.2.6. Recommendations for future quality development

In the context of the obligation of the Marketing Authorisation Holder (MAH) to take due account of technical and scientific progress, the CHMP recommends the following points for investigation:

Active substance

1. The MAH should implement relevant testing strategies to ensure an adequate microbiological control for the starting materials.
2. The MAH should implement a relevant testing strategy to ensure that HEPES (Pfizer) raw material, included in the formulation buffer of FP, is free from contaminating RNases.
3. The MAH should implement in-house functional activity analytical methods for release testing of enzymes used in the manufacturing process at all relevant manufacturing sites, by Q1 2021.
4. The MAH should reassess the specification for the linear DNA template purity and impurities. The Applicant has already agreed to supply these by Q2 2021.
5. The MAH should perform and document a gap analysis to identify any supplemental qualification needed to align the methods used for the DNA template control with ICH requirements. The gaps identified should be addressed either prior to transferring the methods to relevant sites or during the transfer activities.
6. The MAH should provide active substance process validation data regarding the finalised

indirect filter qualification assessment and the shipping validation between sites.

7. The MAH should provide the results of the studies performed to enhance the robustness of the DNase digestion step.
8. The MAH should tighten the low limits of the proven acceptable ranges for the target volumes for ATP and CTP, to the levels needed to ensure a sufficiently high mRNA integrity in the active substance manufacturing process.
9. The MAH should comprehensively describe the capability of the next generation sequencing technology platform to detect lower amounts of RNA species of alternative sequence in the presence of the correct, more abundant RNA for the active substance.
10. The MAH should discuss the results and the assay suitability for the cell-based flow cytometry and the western blot method used for biological characterization of protein expression for the active substance.
11. The MAH should provide a summary of the validation/verification status of the immunoblot analytical procedure used to detect double stranded RNA (dsRNA) in BNT162b2 active substance.
12. In order to improve the control strategy, the MAH should provide the protocol on preparation and qualification of future primary and working reference standards for the active substance.

Finished Product

13. The updated results from the finished product leachables studies should be provided for assessment.
14. In order to ensure batch to batch consistency of the finished product the MAH should expand the description of the manufacturing process with more details. (1) When the batch size is twice the original one, the range number of active substance bags and active substance batches to be thawed, and the number of mixers should be stated. (2) The MAH should confirm the configuration of filters used in finished product manufacture. (3) The surface area of the sterile filter should be adapted to the batch size, unless otherwise justified; (4) process control for RNA content prior to dilution is important, particularly if several runs of TFF are performed in parallel with batch sizes
15. Data on verification of in-process test methods should be provided for assessment during Q1 2021.
16. In order to improve the control strategy, the MAH should provide results of the validation plan phase 2 of the rapid sterility test for assessment before implementation.
17. A risk assessment should be provided with respect to the potential presence of elemental impurities in the active product based on the general principles outlined in Section 5.1 of ICH Q3D and Ph. Eur. monograph Pharmaceutical Preparations (2619). A summary of this risk assessment should be submitted. The risk assessment should cover all relevant elements and sources in accordance with the guideline. The summary must enable a quantitative comparison of observed or predicted levels with the PDE’s given in the guideline. It should contain what is necessary to evaluate the appropriateness and completeness of the risk assessment, including any assumptions, calculations etc. made. The control strategy for elemental impurities should be justified based on the risk assessment.
18. The MAH should provide the protocol on preparation and qualification of future primary and working reference materials for finished product testing.
19. In order to provide further information regarding the stability of finished product, Results from photostability testing and temperature cycling studies of the finished product should be provided for assessment in Q1 2021.
20. The applicant should provide the 6 months stability data for the finished product process performance qualification batches for assessment as soon as they are available.
21. This applicant proposed change to the product information to indicate that up to 6 doses can

be delivered from the vial was not considered acceptable as no supporting data was provided. In order to support such a change in the product information, a variation should be submitted to update the specification limits for extractable volume, supported by appropriate pharmaceutical development data to support the claim of 6 doses.

22. The MAH should investigate the opportunities for an increased temperature at long term storage conditions for the finished product from -70 °C to -20 °C. In addition, the MAH should investigate the possibility to prolong the in-use storage time (before dilution) of 5 days at 2-8 °C as well as the possibilities to extend the claims for transport conditions at 2-8 °C.
23. The MAH should provide the results for assessment from the filter validation as soon as they are available.

2.3. Non -clinical aspects

GLP inspections

The pivotal toxicological studies are stated to be GLP compliant by the Applicant. There were some issues identified during the assessment with repeat-dose toxicity study #38166 regarding the documentation which have led to a study audit GLP inspection conducted by the local German GLP Compliance Monitoring Authority at the facility where the study was performed, in November 2020. All the answers to the issues were acknowledged by the CHMP. The Applicant gave also comments on these issues. In light of all the elements provided, the issues identified were considered resolved.

With regard to repeat-dose toxicity study #20GR142 the only major concern identified was resolved with the answers from the Applicant that were considered satisfactory by the CHMP.

2.3.1. Pharmacology

The pharmacology dossier is based on initial studies of the functionality of the BNT162b2 (V9) RNA-based product and the encoded SARS-CoV-2 P2 S protein as well as on supporting studies of SARS-CoV-2 P2 S protein structure. This is followed by characterisation of the humoral and cellular immune response in mouse and nonhuman primate upon immunization with BNT162b2 (V9) and ends up with a SARS-CoV-2 challenge study of BNT162b2 (V9) immunized nonhuman primates.

No secondary pharmacodynamic, safety pharmacology or pharmacodynamic drug interaction studies have been conducted with BNT162b2 due to the nature of the RNA-based vaccine product, which is according to applicable guidelines (WHO guideline on nonclinical evaluation of vaccines, WHO Technical Report Series, No. 927, 2005).

Mechanism of action

SARS-CoV-2 infects the body by the use of the Spike protein (S) to attach to specific cell surface receptors, of which the angiotensin converting enzyme 2 (ACE2) may constitute a major part, as recently suggested. In addition to the initial attachment to a host cell, the S protein is also responsible for viral envelope fusion with the host cell membrane resulting in genome release. Due to its indispensable role, the S protein is a major target of virus neutralizing antibodies and has become a key antigen for vaccine development. By immunisation with the modified RNA (modRNA) product BNT162b2, encoding for the S protein, the intention is to trigger a strong and relatively long-lasting production of high affinity virus neutralizing antibodies, which can act through blocking the S-protein and it’s receptor-binding domain (RBD) interaction with host cell receptors but also by opsonisation mediated virus clearance. In addition, the immunisation with BNT162b2 is also intended to elicit a concomitant T cell response of the Th1 type, supporting the B cells responsible for the production of S-specific antibodies and cytotoxic T cells that kill virus infected cells.

The S protein is a trimeric class I fusion protein that exists in a metastable prefusion conformation before engaging with a target cell. BNT162b2 encodes a P2 mutant (P2 S) variant of S where two consecutive proline mutations have been introduced in order to lock the RBD in the prefusion conformation. In addition, BNT162b2 is nucleoside-modified by a substitution of 1-methyl-pseudouridine for uridine and thus its inherent adjuvant activity mediated by binding to innate immune sensors such as toll-like receptors (TLRs) 7 and 8, is dampened, but not abrogated. Furthermore, the structural elements of the vector backbones of the BNT162b2 are optimised for prolonged and strong translation of the antigen-encoding RNA.

The potency of the RNA vaccine is further optimised by encapsulation of the RNA into lipid nano particles (LNPs), which protects the RNA from degradation by RNAses and enable transfection of host cells after intramuscular (i.m.) delivery. The functional and ionizable lipid, ALC-0315, is identified as the primary driver of delivery as it allows the LNPs to have a neutral charge in a physiological environment to facilitate internalization; the endosomal environment exhibits a positive charge and therefore triggers the translocation of RNA into the cytosol (Midoux & Pichon, 2015; Hassett et al, 2019; Patel et al, 2019); ALC-0159 is included in the formulation to provide a steric barrier to: 1) facilitate the control of particle size and homogeneity during manufacturing and product storage, and 2) regulate the association of plasma and proteins with the LNP surface. The composition of the LNPs may also affect the distribution of injected BNT162b2. In addition, it cannot be excluded the LNP composition contributes to the overall immunogenicity.

Administration of LNP-formulated RNA vaccines IM results in transient local inflammation that drives recruitment of neutrophils and antigen presenting cells (APCs) to the site of delivery. Recruited APCs are capable of LNP uptake and protein expression and can subsequently migrate to the local draining lymph nodes where T cell priming occurs. In general, following endocytosis of LNPs, the mRNA is released from the endosome into the host cell cytosol (Sahay et al, 2010; Maruggi et al, 2019). The process of an RNA vaccine-elicited immune response has been demonstrated in both murine and nonhuman primate models (Pardi et al, 2015; Liang et al, 2017).

Primary pharmacodynamic studies

Primary pharmacodynamic studies in vitro

To confirm the functionality of the BNT162b2 (V9) RNA-based product, protein expression, transfection frequency from BNT162b2 and cell surface expression of the SARS-CoV-2 P2 S protein antigen was assessed. BNT162b2 (V9) transfection of HEK293T cells indicated SARS-CoV-2 P2 S was correctly expressed on the cell surface, as indicated by flow cytometry staining of non-permeabilized cells with an anti-S1 monoclonal antibody. In addition, the cellular localisation of expressed S1 protein was investigated. The S protein co-localized with an ER marker, as detected by immunofluorescence experiments in HEK293T cells expressing BNT162b2-RNA, suggesting the S protein is processed within the ER.

In a set of supportive studies, it was investigated whether BNT162b2 RNA encodes for an amino acid sequence that authentically express the ACE2 binding site (RBD). Recombinant P2 S was expressed from DNA encoding for the same amino acid sequence as BNT162b2 RNA encodes for. Flow cytometry staining with spike protein (S) binding agents, as human ACE2 and monoclonal antibodies known to bind to authentic S-protein all indicated an authentically presented P2 S protein and ACE2 binding site. Low nanomolar affinity of P2 S binding to ACE2 PD and B38 mAb was demonstrated with the use of biolayer Interferometry.

To further structurally characterize the P2 spike protein, a cryo-electron microscopy (cryoEM) investigation of purified P2 S, expressed from DNA, was conducted. The cryoEM revealed, according to the Applicant, a particle population closely resembling the prefusion conformation of SARS-CoV-2 spike protein. By fitting a previously published atomic model on to a processed and refined cryoEM dataset, a rebuilt model was obtained showing good agreement with reported structures of prefusion full-length wild type S and its ectodomain with P2 mutations. In the prefusion state the RBD undergo hinge-like conformational movements and can either be in an "up" position (open for receptor binding) or in a "down" position (closed for receptor binding). Three-dimensional classification of the dataset showed a class of particles that was in the conformation one RBD 'up' and two RBD 'down". This partly open conformation represented 20.4% of the trimeric molecules. The remainder were in the all RBD 'down' conformation. Although potent neutralizing epitopes have been described when the RBD is in the "heads down" closed conformation, the "heads up" receptor accessible conformation exposes a potentially greater breadth of neutralizing antibody targets. It is concluded that antibodies to both the up and down conformations will potentially be formed upon immunisation with the P2 S encoding BNT162b2.

Primary pharmacodynamic studies in vivo

The humoral and cellular immune response following IM administration of BNT162b2 (V9) was investigated in mice and nonhuman primates. The choice and relevance of the mouse for pharmacological animal model studies was based on the in-depth knowledge about the suitability, dosing and immunization regimen of BALB/c mice for RNA-based vaccine development. Non-human primates were chosen as they are a higher-ordered species, more closely related to humans, which may better reflect immune responses in humans. The selection of rats as the toxicology test species is consistent with the World Health Organization (WHO) guidance documents on nonclinical evaluation of vaccines (WHO, 2005). The documents recommend conducting vaccine toxicity studies in a species which mounts an immune response to the vaccine. The Wistar Han (WH) rat developed an antigen-specific immune response following BNT162b2 vaccination.

Balb/c, females were immunized IM on day 0 with 0.2, 1 or 5 µg RNA/animal of BNT162b2 (V9), or with buffer alone (n=8). Blood samples were collected on Days 7, 14, 21 and 28 after immunization. The IgG antibody response to SARS-CoV-2- RBD or S1 was analysed by ELISA. Immunization with BNT162b2 induced IgGs that bound to S1 and RBD, as detected by ELISA, and on day 28 after immunization showed a binding affinity of KD 12 nM or 0.99 nM (geometric mean) respectively, as detected by surface plasmon resonance.

To further characterise the antibody response to BNT162b2 and its potential capacity to reduce SARS-CoV-2 infections, a pseudo virus type neutralization assay (pVNT) was used as a surrogate of virus neutralization since studies with authentic SARS-CoV-2 requires a BSL3 containment. The pVNT was based on a recombinant replication-deficient vesicular stomatitis virus (VSV) vector that had been pseudotyped with SARS-CoV-2 S protein according to published protocols. A dose-dependent increases in SARS-CoV-2-S VSV pseudovirus neutralizing antibodies were observed in sera from BNT162b2-immunized mice. On day 14, the difference of the group treated with 5 µg RNA compared to the buffer control was statistically significant (p = 0.0010). On days 21 and 28, the differences of the groups treated with 1 µg and 5 µg BNT162b2 compared to the buffer control were statistically significant. The relevance of the pseudovirus assay for authentic SARS-CoV-2 was not discussed. For technical reasons, it was not possible to determine a ratio of neutralizing to non-neutralizing antibodies.

Immunisation of mice with BNT162b2 also induced IFN-secreting cells of both the CD4+ and CD8+ T-cell subsets. This was shown by ELISPOT after *ex vivo* re-stimulation of splenocytes with an S-protein overlapping peptide pool Day 28 after immunization. Cytokine profiling was also carried out by Multiplex analysis of cytokine release from the Day 28 Splenocytes. High levels of the Th1 cytokines IFN and IL-2 but minute amounts of the Th2 cytokines IL-4, IL-5 and IL-13 were detected after re-stimulation with S but not RBD overlapping peptide mix. The much higher immune cellular responses elicited against the S1 protein compared to the RBD domain could be explained by the presence of significantly more T cell epitopes in the larger full-length S peptide mix (in addition, S1 covers the RBD domain). It should be emphasized that cellular immune reactivity is much more important against S1 than against the RBD domain, where neutralizing antibodies are more important to the latter. In addition, an elevated secretion of TNFD, GM-CSF, IL-ȕ,/-12p70 and IL-18 was recorded after re-stimulation. In order to characterize the immunophenotype of B-and T-cells appearing in lymph nodes from mice immunized with BNT162b2 (V9), B- and T-cell subsets in draining lymph node cells were quantified by flow cytometry 12 days after immunization. Higher numbers of B cells were observed in the samples from mice that received BNT162b2 compared to controls. That included plasma cells, class switched IgG1- and IgG2a-positive B cells, and germinal centre B cells. T-cell counts were elevated, particularly numbers of T follicular helper (Tfh) cells, including subsets with ICOS upregulation, which play an essential role in the formation of germinal centres (Hutloff 2015).

In the nonhuman primate (rhesus macaques) studies, BNT162b2 (V9) was shown to be immunogenic after intramuscular administration. The serum concentrations of both S1-binding and the SARS-CoV-2 neutralizing antibody titres were at least an order of magnitude higher after BNT162b2 immunization of rhesus macaques than for the panel of SARS-CoV-2 convalescent human sera. In this study, total antibody response is measured using a luminex assay and results expressed on U/ml and for the neutralization assay results are expressed in VNT 50.

Antigen specific S-reactive T-cell response after BNT162b2 immunization of the macaques was measured by ELISPOT and ICS. While S-specific T cells were low to undetectable in naïve animals, VWURQJ,)1ȖEXWPLQLPDO,/-4 ELISpot responses were detected after the second 30 or 100 µg dose of the BNT162b2. Intra cellular staining (ICS) confirmed that BNT162b2 immunization elicited strong S-VSHFLILF,)1ȖSURGXFLQJ7K1FHOOUHVSRQVHVLQFOXGLQJDKLJKHUIUHTXHQF\RI&'FHOOVWKDWSURGXFHG,)1Ȗ,/-2, or TNF-alpha but a lower frequency of CD4+ cells that produce IL-4. An S-VSHFLILF,)1Ȗ producing CD8+ T cell response was also recorded.

A challenge study in rhesus macaques was conducted as nonclinical proof of concept (PoC). Rhesus macaques share a 100% homology with the human ACE2 sequence that interacts with the RBD of the S protein. BNT162b2 (V9) immunized macaques were challenged with SARS-CoV-2 intra nasally and intratracheally 55 days after the second immunization with BNT162b2. Rhesus macaques were immunized on days 0 and 21, in order to align with the clinical vaccination regimen. Some other COVID-19 vaccine candidates have different prime-boost intervals, such as 4 weeks for both ChAdOx1 (Graham et al., 2020) and mRNA-1273 (Corbett et al., 2020). At the time of challenge, SARS-CoV-2 neutralising titres ranged from 260 to 1,004 in the BNT162b2 (V9)-immunized animals. Neutralising titres were undetectable in animals from the control-immunized and sentinel groups. The presence of SARS-CoV-2 RNA was monitored by nasal and oropharyngeal (OP) swabs and bronchoalveolar lavage (BAL). Viral RNA was detected in BAL fluid from 2 of the 3 control-immunized macaques on Day 3 after challenge and from 1 of 3, on Day 6. At no time point sampled was viral RNA detected in BAL fluid from the BNT162b2 (V9)-immunized and SARS-CoV-2 challenged macaques. The difference in viral RNA detection in BAL fluid between BNT162b2-immunized and control-immunized rhesus macaques after challenge is statistically significant (p=0.0014). From control-immunized macaques, viral RNA was detected in nasal swabs obtained on Days 1, 3, and 6 after SARS-CoV-2 challenge; from BNT162b2 (V9)-immunized macaques, viral RNA was detected only in nasal swabs obtained on Day 1 after challenge and not in swabs obtained on Day 3 or subsequently. The pattern of viral RNA detection from OP swabs was similar to that for nasal swabs. No signs of viral RNA detected vaccine-elicited disease enhancement were observed. The viral RNA levels between control-immunized and BNT162b2-immunized animals after challenge were compared by a non-parametric analysis (Friedman’s test), and the p-values are 0.0014 for BAL fluid, 0.2622 for nasal swabs, and 0.0007 for OP swabs.

Despite the presence of viral RNA in BAL fluid from challenged control animals, none of the challenged animals, immunized or control, showed clinical signs of illness (weight change, body temperature change, blood oxygen saturation and heart rate). The Applicant concluded, the absence of clinical signs in any of the challenged animals, immunised or control, despite the presence of viral RNA in BAL fluid from challenged control animals, indicates that the 2-4 year old male rhesus monkey challenge model appears to be an infection model, but not a clinical disease model. However, a further investigation by lung radiograph and computerized tomography (CT) was conducted. Radiographic evidence of pulmonary abnormality was observed in challenged controls but not in unchallenged sentinels nor in challenged BNT162b2-immunized animals except for a CT-score signal in 1 of 6 pre infection and 2 out of six at Day 10/EOP in BNT162b immunised animals. The CT score signal was at the same level as the control at Day 10/EOP. No radiographic evidence of vaccine-elicited enhanced disease was observed.

Secondary pharmacodynamic studies

No secondary pharmacodynamics studies were conducted with BNT162b2, which is acceptable to the CHMP.

Safety pharmacology studies

No safety pharmacology studies were conducted with BNT162b2. The Applicant refers to that they are not considered necessary according to the WHO guideline (WHO, 2005). In addition, no findings on vital organ functions have been recorded in the repeat dose toxicology studies. Thus, the absence of safety pharmacology studies is endorsed by the CHMP.

Pharmacodynamic drug interactions studies

No pharmacodynamics drug interaction studies were conducted with BNT162b2. This is agreeable to the CHMP.

2.3.2. Pharmacokinetics

The applicant has determined the pharmacokinetics of the two novel LNP excipients ALC-0315 (aminolipid) and ALC-0159 (PEG-lipid) in plasma and liver as well as their elimination and metabolism in rats. Furthermore, the Applicant has studied the biodistribution of the two novel lipids (in rats) and the biodistribution of a LNP-formulated surrogate luciferase RNA in mice (IV), as well as the biodistribution of a [^{3}H]-Labelled Lipid Nanoparticle-mRNA Formulation in rats (IM).

No traditional pharmacokinetic or biodistribution studies have been performed with the vaccine candidate BNT162b2.

In study PF-07302048_06Jul20_072424, the applicant has used a qualified LC-MS/MS method to support quantitation of the two novel LNP excipients. The bioanalysis methods appear to be adequately characterized and validated for use in the GLP studies.

PK studies with the two novel LNP-excipients ALC-0315 and ALC-0159:

Wistar Han rats were IV bolus injected with LNP formulated luciferase-encoding RNA at 1 mg/kg and ALC-0315 and ALC-0159 concentrations at 15,3 mg/kg and 1,96 mg/kg respectively. ALC-0315 and ALC-0159 levels in plasma, liver, urine and faeces were analysed by LC-MS/MS at different time-points up to 2-weeks.

ALC-0315 and ALC-0159 were rapidly cleared from plasma during the first 24 hours with an initial t½ of 1.62 and 1.72 h, respectively. 24 hours post-dosing, less than 1% of the maximum plasma concentrations remained. A slower clearance rate was observed after 24 hours with ALC-0315 and ALC-0159 terminal elimination t½ of 139 and 72.7 h, respectively.

Following plasma clearance, the liver appears to be to major organ to which ALC-0315 and ALC-0159 distribute. The applicant has estimated the percent of dose distributed to the liver to be ~60% for ALC-0315 and ~20% for ALC-0159. The observed liver distribution is consistent with the observations from the biodistribution study and the repeat-dose toxicology, both using IM administration.

For ALC-DPLQROLSLGWKHPD[LPXPGHWHFWHGFRQFHQWUDWLRQLQWKHOLYHUOLYHUDV reached 3 hours after IV injection. ALC-0315 was eliminated slowly from the liver and after 2-weeks the concentration of ALC-0315 was still ~25% of the maximum concentration indicating that ALC-0315 would be eliminated from rat liver in approximately 6-weeks. For ALC-0159 (PEG-lipid), the maximum GHWHFWHGFRQFHQWUDWLRQLQWKHOLYHUOLYHUDVUHDFKHGPLQXWHVIROORZLQJ,9 injection. ALC-0159, was eliminated from the liver faster than ALC-0315 and after 2-weeks the concentration of ALC-0159 was only ~0,04% of the maximum detected concentration. The applicant was asked to discuss the long half-life of ALC-0315 and its effect, discussion on the comparison with patisiran, as well as the impact on the boosts and post treatment contraception duration. The applicant considered that there were no non-clinical safety issues based on the repeat dose toxicity studies at doses (on a mg/kg basis) much greater than administered to humans; this was acceptable to the CHMP.

Both patisaran lipids showed an essentially similar PK profile in clinic with a strongly biphasic profile and long terminal half-lives. According to the applicant, it is difficult to further contextualize the pharmacokinetic data and therefore to understand the safety of these molecules, beyond consideration of dose. There is a large dose differential between the human BNT162b2 dose and the dose used in the toxicity studies (300-1000x) which provides an acceptable safety margin.

Moreover, according to the Applicant given the large difference in dose between the toxicity studies and the clinically efficacious dose (300-1000x), it is unlikely that the administration of a booster dose will lead to significant accumulation. Finally, the applicant is of the opinion that these results support no requirements for contraception. The CHMP found this position agreeable.

While there was no detectable excretion of either lipid in the urine, the percent of dose excreted unchanged in faeces was ~1% for ALC-0315 and ~50% for ALC-0159.

Biodistribution of a LNP-formulated luciferase surrogate reporter:

To determine the biodistribution of the LNP-formulated modRNA, the applicant did study distribution of the modRNA in two different non-GLP studies, in mice and rats, determined the biodistribution of a surrogate luciferase modRNA formulated with a LNP with identical lipid composition used in BNT162b2 (mouse study) or the biodistribution of a [3H]-Labelled Lipid Nanoparticle-mRNA Formulation (rat study).

The mouse study used three female BALB-c mice per group and luciferase protein expression was determined by *in vivo* bioluminescence readouts using an *In Vivo* Imaging System (IVIS) following injection of the luciferase substrate luciferine. The readouts were performed at 6h, 24h, 48h, 72h, 6d and 9d post IM injection (intended clinical route) in the right and OHIWKLQGOHJIWKHDFKLWRWDORI JRI/13 -formulated luciferase RNA.

In vivo luciferase expression was detected at different timepoints at the injection sites and in the liver region indicating drainage to the liver. As expected with an mRNA product, the luciferase expression was transient and decreased over time. Luciferase signals at the injection sites, most likely reflecting distribution to the lymph nodes draining the injection sites, peaked 6h post injection with signals of approximately 10 000 times of buffer control animals. The signal decreased slowly during the first 72 hours and after 6 and 9 days the signals were further weakened to approximately levels of 18 and 7 times the signals obtained from animals injected with buffer control.

The signals from the liver region peaked 6h post injection and decreased to background levels 48h after injection. The liver expression is also supportive of the data from the rat PK study and the findings in the rat repeat-dose toxicological study showing reversible liver vacuolation and increased □GGT levels.

The biodistribution was also studied in rats using radiolabeled LNP and luciferase modRNA (study 185350). The radiolabeling data, measuring distribution to blood, plasma and selected tissues, of IM inMHFWLRQRIDVLQJOHGRVHRIP51RYHUD□ -hour period is considered more sensitive than the bioluminescence method and indicate a broader biodistribution pattern than was observed with bioluminescence. Over 48 hours, distribution from the injection site to most tissues occurred, with the majority of tissues exhibiting low levels of radioactivity.

Radioactivity was detected in most tissues from the first time point (0.25 h) and results support that injections site and the liver are the major sites of distribution. The greatest mean concentration was found remaining in the injection site at each time point in both sexes. Low levels of radioactivity were detected in most tissues, with the greatest levels in plasma observed 1-4 hours post-dose. Over 48 hours, distribution was mainly observed to liver, adrenal glands, spleen and ovaries, with maximum concentrations observed at 8-48 hours post-dose. Total recovery (% of injected dose) of radiolabeled LNP+modRNA outside the injection site was greatest in the liver (up to 21.5%) and was much less in VSOHHQ'DGUHQDOJODQGV'DQGRYDULHV'7KHPHDQFRQFHQWUDWLRQVDQGWLVVXH□ distribution pattern were broadly similar between the sexes. No evidence of vaccine-related macroscopic or microscopic findings were found in the ovaries in the repeat-dose toxicity studies (Study 38166 and Study 20GR142) and no effects on fertility were identified in the DART study.

Immunogenicity of a LNP formulated luciferase modRNA:

Activation of the innate immune system following IM injection of a LNP-formulated luciferase reporter RNA into mice was assessed in a Luminex-based multiplex assay were serum samples (day -1 (pre), 6 h and day 9) were tested for levels of the following chemokines and cytokines: MCP-1, MIP-1ZLI)□ -□□ IFN-□)1□ - ,/□ -2, Il-6, IL-10, IL1-,3□ -10. The applicant tested 3 different LNPs, all formulated together with luciferase RNA. The results suggest that the LNP formulation used in BNT162b2 (LNP8) slightly increased levels of MCP-1, IL-6, and IP-10 at 6h post immunisation. All chemokine/cytokine levels dropped to background levels at day 9.

In addition to innate immune activation, LNP formulated luciferase modRNA was able to induce IFN-□ T-cell responses (when challenged with MHC I-specific luciferase peptide pools) measured in splenocytes isolated from the mice at day 9.The LNP formulated luciferase modRNA did not induce the formation of luciferase-specific IgGs as measured by ELISA.

In an additional hPBMC study (R-20-0357), overall, low levels of pro-inflammatory cytokines (TNF, IL-□)1□,/□ -DQGLRRUPHGLXPOHYHOVRIFKHPRNLQHV,3□ -10, MIP-□&3□ -1) were secreted when assayed in an exploratory *in vitro* reactogenicity assay using human PBMCs from three donors. IP-10, MIP-1b, MCP-1 were seen to be increased among donors, because of transfection of antigen presenting cells after infection.

Metabolism of the two novel LNP-excipients ALC-0315 and ALC-0159:

Metabolism studies were conducted to evaluate the two novel lipids in the LNP, ALC-0315 (aminolipid) and ALC-0159 (PEG-lipid). No metabolic studies were performed with the modRNA or the other two lipids of the LNP. Overall, it seems as both ALC-0159 and ALC-0315 are metabolised by hydrolytic metabolism of the amide or ester functionalities, respectively, and this hydrolytic metabolism is observed across the species evaluated.

The metabolism of the novel excipients, ALC-0159 and ALC-0315, were examined *in vitro* using blood, liver S9 fractions and hepatocytes, all from mouse, rat, monkey and human. The *in vivo* metabolism was examined in rat plasma, urine, faeces, and liver from a rat pharmacokinetics study where a luciferase-encoding modRNA formulated in an LNP was used.

Metabolism of ALC-0315 appears to occur via two sequential ester hydrolysis reactions, first yielding the monoester metabolite followed by the doubly de-esterified metabolite. The monoester metabolite was observed *in vitro* in rat blood, monkey S9 fraction, and *in vivo* in rat plasma and rat liver. The doubly de-esterified metabolite was observed *in vitro* in mouse and rat blood; monkey liver S9 fraction; and *in vivo* in rat plasma, urine, faeces and liver. Subsequent metabolism of the doubly de-esterified metabolite resulted in a glucuronide metabolite which was observed in urine only from the rat pharmacokinetics study. Additionally, 6-hexyldecanoic acid, the acid product of both hydrolysis reactions of ALC-0315, was identified *in vitro* in mouse and rat blood; mouse, rat, monkey and human hepatocytes; mouse, rat and human liver S9 fractions; and *in vivo* in rat plasma.

ALC-0315 was stable over 120 min (>93% remaining) in liver microsomes and S9 fractions and over 240 min (>93% remaining) in hepatocytes in all species and test systems.

The primary route of metabolism for ALC-0159 appears to involve amide bond hydrolysis yielding *N*,*N*-ditetradecylamine. This metabolite was identified in mouse and rat blood as well as hepatocytes and liver S9 from mouse, rat, monkey and human.

ALC-0159 was stable over 120 min (>82% remaining) in liver microsomes and S9 fractions and over 240 min (>87% remaining) in hepatocytes in all species and test systems.

Excretion of the two novel LNP-excipients ALC-0315 and ALC-0159:

Excretion of the two novel lipids in the LNP, ALC-0315 (aminolipid) and ALC-0159 (PEG-lipid) was studied in the rat PK study. No excretion studies were performed with the modRNA or the other two lipids of the LNP which is considered acceptable by the CHMP.

While there was no detectable excretion of either lipid in the urine, the percent of dose excreted unchanged in faeces was ~1% for ALC-0315 and ~50% for ALC-0159. Since almost no unchanged ALC-3015 was detected in urine or faeces, metabolism may play a bigger role in the elimination of ALC-0315 than ALC-0159.

2.3.3. Toxicology

The toxicological dossier for BNT162b2 is based on a total of three pivotal toxicological experimental studies; two repeat-dose toxicity rat studies and one DART fertility-EFD rat study. The test substance in the repeat-dose toxicity studies is BNT162b2 (100 µg of variant 8 in one study (study 38166) and 30 µg of the clinically relevant variant 9 in the second study (study 20GR142)), which consists of a modified RNA in a lipid nanoparticle (LNP) formulation. The differences between the variants are due to codon optimization. The LNP contains four excipients whereof two are considered novel (ALC-0315 and ALC-0159).

Repeat dose toxicity

The two general/repeat-dose toxicity studies involved IM exposure of Han Wistar rats to BNT162b2 for a total of 17 days (three weekly administrations) followed by three weeks of recovery. Overall, the study designs only included a single experimental group each with a variant of BNT162b2 (V8 or V9 variant), with no dose-response assessment or specific experimental groups for the LNP alone or its novel excipients. No test substance-linked mortality or clinical signs were observed (except a slight increase [<1C] in body temperature). No ophthalmological and auditory effects were found. The animal model of choice, the rat, has not been assessed in the pharmacological dossier but a limited absorption/distribution study has been conducted in pharmacokinetics dossier. Immunogenicity was assessed in the toxicology studies.

Body weight and food intake: Exposure generated a slight reduction of absolute BW statistically significant at D9 (-6.8% to -11.3%; BNT162b2 V8) alternatively a weak body weight increase reduction [BNT162b2 v9]. No changes in food intake were observed.

Gross pathology and organ weights: At 100ug BNT162b2 V8 and 30ug BNT162b2 V9, the tissue at the injection site was thickened/enlarged with oedema and erythema at the end of exposure in a reversible manner. The spleen was enlarged (reversible) with up to 60% for both vaccine variants and doses. There was also an enlargement of the draining and inguinal lymph nodes at 100ug (BNT162b2 V8). Overall, there were signs of a significant immune response which is likely linked to the test substance. There was a trend of slightly enlarged liver in females at 100ug (BNT162b2 V8) but not at 30ug (BNT162b2 V9).

Histopathology: At 100ug BNT162b2 V8, there were observations of various inflammatory signs at the injection site (e.g. fibrosis, myofiber degeneration, oedema, subcutis inflammation and epidermis hyperplasia). Also, there was inflammation of the perineural tissue of the sciatic nerve and surrounding bone in most rats at d17. The bone marrow demonstrated increased cellularity and the lymph nodes showed plasmacytosis, inflammation and increased cellularity. The spleen demonstrated increased haematopoiesis in half the animals at d17. The liver showed hepatocellular periportal vacuolation at d17 (fully reversed during recovery) which may be related to hepatic clearance of ALC0315. Histopathology assessment of 30ug BNT162b2 V9 generated similar results as 100ug BNT162b2 V8 although not on as extensive level (possibly due to a lesser dose). Minimal to moderate inflammation and oedema was observed at the injection site (usually resolved after ~3d). There was minimal to moderate increased plasma cell cellularity in the lymph nodes and germinal center cellularity plus hematopoietic cell cellularity in the spleen at d17 (reversible at end of recovery). There was minimal increase cellularity in the bone marrow. Reversible vacuolisation in the liver was also observed.

The Applicant explained that peri-portal liver vacuolization was observed in both pivotal studies but are not related to any microscopic evidence of liver/biliary injury in animals (cellular hypertrophy, inflammation) nor any clinical data from Phase 1 study. Vacuoles are considered by the Applicant to be a result of ALC-0315 accumulation in liver and not PEG.

A novel finding at 30ug was minimal extra-capsular inflammation in the joints at d17.

Moreover, increases in neutrophils, monocytes, eosinophils and basophils were observed in study 20GR142. For the Applicant, increases in neutrophils, monocytes, eosinophils and basophils observed in the Study 20GR142 were related to the inflammatory/immune response to BNT162b2 administration. [illegible] applicant stated that the increases in eosinophils and basophils are a minor component of the inflammatory leukogram, which is dominated by increases in neutrophils. The applicant also informed that characterisation of large unstained cells was not conducted since the identification of these cells does not provide additional information. The CHMP found this agreeable.

Immunogenicity: Treatment of rats with 100 ug BNT162b2 V8 generated SARS-CoV-2 neutralizing titers (based on a vesicular stomatitis virus (VSV)-based pseudovirus neutralization assay) and IgG antibodies against the S1 fragment and the RBD (based on ELISA) in serum samples. Treatment of rats with 30 ug BNT162b2 V9 generated SARS-CoV-2 neutralizing antibodies (not a pseudovirus neutralization assay).

Haematology: At 30ug BNT162b2 V9 and 100ug BNT162b2 V8, there was a moderate to strong reduction of reticulocytes (48-74%, not specified for V9) coupled to lowered red cell mass parameters (RBC, HGB, and HCT). There was a moderate to strong increase (>100%) in large unclassified cells [LUC], neutrophils, eosinophils, basophils and fibrinogen that may be related to the inflammatory/immune response. The changes were reversible. No effects on coagulation were observed for V8 whereas a slight increase in fibrinogen was observed with V8 and V9.

Clinical pathology: A very strong but reversible increase (>100%) in pro-inflammatory acute phase proteins in the blood (A1AGP, A2M) was seen with both 30ug BNT162b2 V9 and 100ug BNT162b2 V8. Also, indicative of pro-inflammation, a slight to moderate reduced albumin/globulin ratio was seen for ERWKYDULDQWV9KHH[SRVXUHJHQHUDWHGLQFUHDVHGOHYHOVRI*7DQGLQFUHDVHG*7□ enzyme activity and increased AST levels (+ ~19%). V9 (30ug) exposure led to slight to moderate increases in AST and ALP levels (+20-SRVVLEOHLQGLFDWLYHRIOLYHUHIIHFWVFKWQRFKDQJHVLQ*7□ OHYHOV7KHUHHUHQRFKDQJHVLQFWRNLQHOHYHOV,)17)DOSKD,O1b, Il6, Il-10) after 100ug V8 exposure (not measured for V9). For 100ug V8, there were no changes measured in urine whereas there was a slight-moderate reduction in pH for 30ug V9.

Genotoxicity

No genotoxicity studies have been provided. This is acceptable as the components of the vaccine formulation are lipids and RNA that are not expected to have genotoxic potential.

The novel excipient ALC-0159 contains a potential acetamide moiety. Risk assessment performed by the Applicant indicates that the risk of genotoxicity relating to this excipient is very low based on literature data where acetamide genRWR[LFLWLVDVVRFLDWHGLWKKLJKGRVHVDQGFKURQLFDGPLQLVWUDWLRQ□ mg/kg/day). Since the amount of ALC-0159 excipient in the finished product is low (50 µg/dose), its clearance is high and only two administrations of the product are recommended for humans, the genotoxicity risk is expected to be very low.

Reproduction Toxicity

In the DART study, the test substances used were BNT162b1, BNT162b2 and BNT162b3, which were given to female rats twice before the start of mating and twice during gestation at the human clinical dose (30 µg RNA/dosing day). The test substances were administered intramuscularly (IM) to F0 female Wistar rats 21 and 14 days before the start of mating (M-21 and M-14, respectively) and then on Gestation Day (GD) 9 and GD20, for a total of 4 doses. A subgroup was terminated at GD21 and another (litter) group was terminated at PND21. SARS-CoV-2 neutralizing antibody titers were found in the majority of females just prior to mating (M-14), in most females and foetuses at the end of gestation (GD21), and in most offspring at the end of lactation (PND21). There was transient reduced body weight gain and food consumption after each dose. No effects on the estrous cycle or fertility index were observed. There was an increase (~2x) of pre-implantation loss (9.77%, compared to control 4.09%) although this was within historical control data range (5.1%-11.5%). Among foetuses (from a total of n=21 dams/litters), there was a very low incidence of gastroschisis, mouth/jaw malformations, right sided aortic arch, and cervical vertebrae abnormalities, although these findings were within historical control data. Regarding skeletal findings, the exposed group had comparable to control group levels of presacral vertebral arches supernumerary lumbar ribs, supernumerary lumbar short ribs, caudal vertebrae number < 5). There were no signs of adverse effects on the postnatal pups (terminated at PND21). It is noted that there is currently no available data on the placental transfer of BNT162b2. This information is reflected in section 5.3 of the SmPC.

Local Tolerance

No dedicated local tolerance studies have been conducted; however the assessment of local tolerance was performed in repeat-dose toxicity studies. At 100ug BNT162b2 V8, there was mostly slight to moderate oedemas but in some cases severe oedema. The severity increased with the 2nd and 3rd injections. The data for 30ug BNT162b2 V9 exposure indicated less severe but similar effects.

2.3.4. Ecotoxicity/environmental risk assessment

In accordance with the CHMP Guideline on the Environmental Risk Assessment of Medicinal Products for Human Use (EMEA/CHMP/SWP/4447100 Corr 2), due to their nature vaccines and lipids are unlikely to result in a significant risk to the environment. Therefore, environmental risk assessment studies are not provided in this Application for Marketing Authorisation, which is considered acceptable.

2.3.5. Discussion on non-clinical aspects

Pharmacology

The proposed medicinal product is composed of a modRNA formulated with functional and structural lipids forming lipid nano particles (LNPs), the latter having the purpose to protect the modRNA from degradation and enable transfection of the modRNA into host cells after IM injection. The composition of the LNPs is likely to affect the distribution of injected BNT162b2. In addition, it cannot be excluded the LNP composition contributes to the overall immunogenicity (see also toxicology below).

The general immune activating mode of action of LNP-formulated RNA vaccines have been described in the literature. The administration of LNP-formulated RNA results in transient local inflammation that drives recruitment of neutrophils and antigen presenting cells (APCs) to the site of delivery. Recruited APCs are capable of LNP uptake and protein expression and can subsequently migrate to the local draining lymph nodes where T cell priming occurs. In general, following endocytosis of LNPs, the mRNA is released from the endosome into the host cell cytosol (Sahay et al, 2010; Maruggi et al, 2019). The process of an RNA vaccine-elicited immune response has been demonstrated in both murine and nonhuman primate models (Pardi et al, 2015; Liang et al, 2017).

Whether other cells than professional APCs may transiently express the vaccine derived spike protein and therefore from a theoretical point of view, as compared to SARS-CoV-2 infected cells, also could potentially be targets for previously primed spike protein reactive cytotoxic T cells, if present, is not known. However, no overt signs of such adverse pharmacological responses have been recorded in the repeat dose toxicity study or in the clinical trials. In the clinical trial, a second dose was administered to patients who had been immunologically primed by the first dose. Moreover, in the clinical trials it appeared around 270 patients that was shown to have been seropositive for SARS-COV-2 before vaccination. In these cases, the expression of the spike protein on host cells occurred in the presence of a primed immune response to the spike protein but no overt adverse pharmacological response has been observed. The low amount of vaccine product in a single dose may limit the distribution of modRNA/LNP mainly to the injection site and to migrating APCs. Due to the transient expression of the modRNA, no persistent expression is expected.

Regarding the structural and biophysical characterization of the modRNA, a schematic description shows that 5 different sequences are included in the BNT162b2, of which two being coding sequences.

Concerning the protein expression obtained from the V8 and V9 variants, specific immune responses (total IgG binding Ab + neutralizing Ab) were obtained at significant levels against the Spike S protein in animals with both variants (in mice and rats), indicating the efficiency of the *in vivo* expression of Spike S protein. An additional study was provided (R-20-0360) further demonstrating *in vitro* protein expression. Transfection efficiency, expression rate and cellular viability were analysed in HEK293T cells, upon transfection with different constructs (saRNA, uRNA, modRNA V8 and V9). HEK293T cells were efficiently transfected by both modRNA V8 and modRNA V9 with higher transfection rate for V9, but quite similar the expression rate by V8 and V9.

Although some of the structural and biophysical characterization of P2 S as a vaccine antigen has been provided, it was investigated in supportive studies based on P2S expressed from DNA and not the product modRNA. While it is not considered to be of critical importance for the assessment in this procedure, it still provides a scientific understanding supporting the nonclinical key studies of humoral and cellular immune response, including SARS-CoV-2 neutralizing antibodies, as well as SARS-CoV-2 challenge nonclinical PoC.

In-vivo pharmacodynamics: The humoral and cellular immune response following IM administration of BNT162b2 (V9) was investigated in mice and nonhuman primates and was based on the in-depth knowledge about the suitability, dosing and immunization regimen of BALB/c mice for RNA-based vaccine development. Nonhuman primates were chosen as they are a higher-ordered species, more closely related to humans, which may better reflect immune responses in humans. This is accepted but a more in-depth discussion on the suitability of these pharmacological animal models have not been provided (e.g. susceptibility for SARS-CoV-2 infection and similarity to COVID 19 disease; potential bias for Th1- or Th2-skewed responses has been well characterized for certain mice strains). Only single immunisation was conducted in mice, as compared to the clinical 2-dose regimen, which was adequate since only characterization of the immune response, but no challenge study was carried out in mice. Also, no or limited attention to the induction of long-term memory responses nor immunogenicity and protection in aged animals has been paid. That being said, the induction of virus neutralizing antibodies in both mice (VSV-SARS-CoV-2 S) and primates (SARS-CoV-2) indicated that BNT162b2 immunization has the potential to induce neutralizing antibodies also in humans. Thus, vaccination with modRNA is expected to induce robust neutralising antibodies and a concomitant T cell response to achieve protective immunity.

In mice, the immune response was assessed by single immunization only. Taking the phenotyping of B and T cells in aggregate, the data indicates a concurrent induction of SARS-CoV-2 S-specific neutralizing antibody titers and a Th1-driven T-cell response by immunization with BNT162b2 (this was also seen in nonhuman primates).

Concerning the nonhuman primate (rhesus macaques) studies, the applicant considers the human convalescent serum panel as an assessable benchmark to judge the quality of the immune response to the vaccine; this is accepted by the CHMP.

Concerning the characterization of the T cell responses, the Applicant suggests the S-VSHFLILF,)1□ producing T cell reVSRQVHLQFOXGLQJDKLJKIUDFWLRQRI&'7FHOOVWKDWSURGXFH,)1/□ -2, or TNF-□but a low frequency of CD4+ cells that produce IL-4, indicates a Th1-biased response occurred after the BNT162b2 (V9) immunization. This reasoning appears acceptable to the CHMP. The role of such a Th1 biased response was put in the context of antigen-specific T-cell responses playing an important role in generation of antigen-specific antibody response as well as in elimination of infected cells to mediate protection against disease.

When immunised macaques were challenged with SARS-CoV-2, a clear and statistically significant effect was observed on reduced presence of viral RNA in bronchoalveolar lavage (BAL) and oropharyngeal (OP) swabs. A clear effect was also recorded by blinded X ray scoring of the lungs. A protective effect is also evident in the CT score Day 3 after challenge, however at Day 10/EOP, there was a CT signal in 2 out of six BNT162b immunized monkeys at the same level as observed in the control group. That signal is of unclear significance since also in 1 out of 6 pre infection BNT162b immunized animals a similar CT-score signal was observed. During this time period the SARS-CoV-2 neutralizing GMT in the BNT162b2-immunised rhesus macaques continued to decrease but remained above the GMT of a human convalescent serum panel.

In conclusion of the preclinical pharmacology, the presented data, including immunogenicity, triggering of neutralizing antibodies and Th1 response and reduced presence of viral RNA in challenged animals as well as radiological lung parameters, provide support for the vaccination approach. Due to species differences in the immune system between animal model species and humans, the conclusion whether this candidate vaccine will be sufficiently effective in humans needs to be established in clinical studies.

Pharmacokinetic

Pharmacokinetic (regarding the two novel LNP excipients): The two novel lipid excipients play different roles in the formulation and have different pharmacokinetics. It is worth to notice that the lipid displaying a persistent kinetic over time in liver is ALC-0315.

ALC-0159 is comprised of a polyethylene glycol (PEG) headgroup (~2000 M.Wt.) attached to hydrophobic carbon chains (ie, the lipid anchor). ALC-0159 is present in BNT162 at a low mol% (<2 mol%), and therefore dose, relative to the other lipids. PEGylated lipid can exchange out of the LNP after administration, thus allowing the desired binding of endogenous proteins (eg, Apolipoprotein E) and removing the steric barrier that would otherwise restrict interactions of the LNP with target cells and proteins.

ALC-0315 is an ionizable aminolipid in BNT162b2 and is the most important lipid component for efficient self-assembly and encapsulation of the mRNA within the LNP, and for providing successful delivery of mRNA into target cells.

The PEG-lipid (ALC-0159) is designed to largely exchange out of the LNP after administration and before uptake into target cells, whereas the aminolipid (ALC-0315) is critical to the efficient intracellular delivery of the mRNA through endosomal uptake and release and must remain with the LNP.

ALC-0159 is much more hydrophilic, in large part due to the presence of the PEG molecule which is known to be a strongly hydrophilic molecule (Ma et al, 1990). Due to the more hydrophilic and essential neutral nature of this molecule, ALC-0159 has a much lower affinity for tissues and relative to ALC-0315 there will be freer compound available for redistribution from tissue to plasma; thus, elimination will be more rapid.

The Applicant pointed out that during the course of the 2-week pharmacokinetic study, liver concentrations of ALC-0315 fell 4-fold from their maximum value indicating that 75% of the material delivered to the liver was eliminated over this two-week period.

ALC-0315 has no known biology. In the absence of this 'biological relevance' the applicant used an estimation of >95% elimination of ALC-0315 to represent the essential elimination from the body. The elimination half-life of ALC-0315 in the liver following IV administration in the rat is approximately 6-8 days. These data indicate that 95% elimination of ALC-0315 will occur approx. 30-40 days following final administration in the rat.

Based on the understanding of the process involved in the terminal half-life, redistribution from tissues into which the lipid nanoparticle is delivered, a similar half-life and time to 95% elimination in human is expected (Mahmood et al, 2010). Examination of the scaling of the comparable lipids (PEG2000-C-DMG, DLin-MC3-DMA) in patisiran indicates that the half-life of these lipids appears to scale with a value approaching the typically used exponent for half-life (0.25). If this is the case for ALC-0315 we may expect a half-life approximating 20-30 days in human for ALC-0315 and 4-5 months for 95% elimination of the lipid (Mahmood et al, 2010).

Both lipids showed an essentially similar PK profile in clinic with a strongly biphasic profile and long terminal half-lives.

Given the large difference in dose between the toxicity studies and the clinically efficacious dose (300-1000x), it is unlikely that the administration of a booster dose will lead to significant accumulation. This is noted by the CHMP.

Biodistribution: Several literature reports indicate that LNP-formulated RNAs can distribute rather non-specifically to several organs such as spleen, heart, kidney, lung and brain.

In line with this, results from the newly transmitted study 185350, indicate a broader biodistribution pattern with low and measurable radioactivity in the ovaries and testes. Given the current absence of toxicity in the DART data, the absence of toxicological findings in gonads in the repeat-dose studies and that the radioactivity in the gonads were low (below 0,1% of total dose), the current data does not indicate it to be a safety concern. The relative high dose used in the rats (500x margin to human dose based on weight) also supports a low risk from distribution to the gonads in humans.

RNA stability and kinetics are not expected to be the same for all RNAs and are influenced by the nucleosides of the RNA and although expression of the full-length spike (S) protein is expected to follow similar kinetics of that of the luciferase with a transient expression fading over time, it cannot be excluded that differences in stability/persistence of the signal could differ between the luciferase protein and the spike (S) protein.

In an additional hPBMC study (R-20-0357), low levels of pro-inflammatory cytokines (TNF, IL-)ȕ,,, IL-DQGDRRUPHGLXPOHYHOVRIFKHPRNLQHV,3 -10, MIP-0&3 -1) were secreted when assayed in an exploratory *in vitro* reactogenicity assay using human PBMCs from three donors. The Applicant underlines that no specific general trend in cytokine secretion can be observed, given variability among donors and based on the low numbers of donors in the experiment.

Toxicology

Although no extensive pharmacological assessment has been conducted in rat (only in mouse and non-human primate), the rat was used as a toxicological animal model in the repeat-dose toxicity studies. The positive neutralization assay results in the repeat-dose toxicity studies demonstrate that V8 and V9 generate an immune response in this species (i.e. SARS-CoV-2 antibodies), partially supporting the use of the rat as an animal model. Other SARS-CoV-2 immune responses in rat remain unclear. The immune responses, especially at the injection sites (e.g. oedema, erythema), seem to increase with each injection in the studies (n=3). There was a marked increase in acute phase proteins, fibrinogen and reduced albumin-globulin ratio (but no increase in cytokines with V8, unclear for V9). There was also a general increase in immune cells (LUC, neutrophils, eosinophils, basophils) and a decrease in red blood cell parameters (reticulocytes, RGB, HGB, HCT). The spleen was enlarged at both 30ug V9 and 100ug V9 and the draining and inguinal lymph nodes were enlarged mostly at 100ug (V8) but also in a few animals at 30ug (V9).

Systemic complement activation (which sometimes may be induced by liposomal drugs and biologicals and potentially result in hypersensitivity reactions) was not investigated as no signs indicative of such clinical manifestations were detected. An absence of dose-response designs in the studies increases the difficulty to interpret the effects. Overall, the V8 and V9 test substances invoked a strong but mostly reversible immune-linked response in rats after 17d exposure. Increases in neutrophils, monocytes, eosinophils and basophils were observed in study 20GR142. For the Applicant, increases in neutrophils, monocytes, eosinophils and basophils observed in the Study 20GR142 were related to the inflammatory/immune response to BNT162b2 administration. Similar findings were also identified in 6WXGLHVLQDQLPDOVDGPLQLVWHUHGPP%17E7K e applicant stated that the increases in eosinophils and basophils are a minor component of the inflammatory leukogram, which is dominated by increases in neutrophils. The Applicant also informed that characterisation of large unstained cells was not conducted since the identification of these cells would not provide additional information. The CHMP agreed with this position.

With regards to the vaccine components, only the whole formulation (modified RNA in LNPs) were used, so there is no toxicological data on the LNP alone or its specific novel excipients. The novel LNP components, these are not considered primarily as adjuvant substances.

No genotoxicity nor carcinogenicity studies have been provided. The components of the vaccine formulation are lipids and RNA that are not expected to have genotoxic potential.

The novel excipient ALC-0159 contains a potential acetamide moiety. Risk assessment performed by the Applicant indicates that the risk of genotoxicity relating to this excipient is very low based on literature GDWDKHUHDFHWDPLGHIHQRWR[LFLWLVDVVRFLDWHGLWKKLJKGRVHVDQGFKURQLFDGPLQLVWUDWLRQLI mg/kg/day). Since the amount of ALC-0159 excipient in the finished product is low (50 µg/dose), its clearance is high and only two administrations of the product are recommended for humans, the genotoxicity risk is expected to be very low.

As the pharmacokinetic distribution studies in rat demonstrated that a relatively large proportion - second to the levels at the injection site - of the total dose distributes to the liver (up to 18%, and far more than levels seen in spleen [<1.1%], adrenal glands [<0.1%] and ovaries [<0.1%]). While there was no severe pathogenesis in liver, there were some reversible functional hepatic and/or biliary effects with V8 and V9 (enlarged liver, vacuolation, strongly increased γGT levels at >200% and activity, minor-moderate increase in levels of AST and ALP) which may be linked to the LNP. 7KHF*7V changes were not observed with 30ug V9, which may be due to variant differences and/or, more likely, a lower dose. The applicant is of the view that the vacuoles are a result of primarily ALC-0315 accumulation in liver. It can be noted that ALC-0159 needs to be lost from the surface of the LNP to facilitate efficient uptake into target cells. At the same time, ALC-0315 is present in the LNP at a high mol% (50 mol%) relative to the other lipids in the BNT162 vaccine, suggesting that this lipid is more likely to be present within the cells (and possibly in the vacuoles).

The assessment of the data available as regards to the DART study shows that there is no clear adverse signs on fertility and early embryogenesis effects. There were no effects on the oestrous cycle in dams but there was an ~2x increase in pre-implantation loss (~9.77% vs 4.1% in controls) but these effects are within historical control data (5.1% to 11.5%) so these findings do not raise any specific concern. It can be noted that the choice of rat as an DART animal model is supported by means of the repeat-dose toxicity rat studies which demonstrates an immune response to the vaccine candidates [V8 and V9] and the publication of Bowman et al (2013; PUBMED ID [PMID] 24391099) that reports that foetal-maternal IgG ratios are relatively low during organogenesis but that these ratios approach 1 by the end of gestation in both rat and human.

2.3.6. Conclusion on the non-clinical aspects

The applicant sufficiently addressed other concerns raised to be granted MA from a non-clinical perspective.

The CHMP is of the view that non-clinical data reveal no special hazard for humans based on conventional studies of repeat dose toxicity and reproductive and developmental toxicity.

Some rats intramuscularly administered Comirnaty (receiving 3 full human doses once weekly, generating relatively higher exposure in rats due to body weight differences) developed some injection site oedema and erythema and increases in white blood cells (including basophils and eosinophils) which is consistent with an inflammatory response as well as vacuolation of portal hepatocytes without evidence of liver injury. All effects were reversible. These findings are described in SmPC section 5.3.

As per guidance, no genotoxicity nor carcinogenicity studies were performed. The components of the vaccine (lipids and mRNA) are not expected to have genotoxic potential. This is acceptable to the CHMP.

Finally, the combined fertility and developmental toxicity study showed that SARS-CoV-2 neutralising antibody responses were present in maternal animals from prior to mating to the end of the study on postnatal day 21 as well as in foetuses and offspring. There were no vaccine-related effects on female fertility, gestation, or embryo-foetal or offspring development up to weaning. The CHMP noted that no data are available on vaccine placental transfer or excretion in milk.

2.4. Clinical aspects

2.4.1. Introduction

Pfizer and BioNTech have developed a vaccine that targets SARS-CoV-2, intended to prevent COVID-19, for which BioNTech initiated a FIH study in April 2020 in Germany (BNT162-01) and Pfizer initiated a Phase 1/2/3 study (C4591001) shortly afterwards in the US which expanded to include global sites upon initiation of the Phase 2/3 part of the study.

Phase 1/2 Study BNT162-01

Study BNT162-01 is the ongoing, FIH, Phase 1 dose level-finding study, in which healthy adults 18 to 55 years of age all receive active vaccine. This study is evaluating the safety and immunogenicity of several different candidate vaccines at various dose levels. The protocol was later amended to allow inclusion of older adult participants up to 85 years of age. The available Phase 1 safety and immunogenicity data for adults 18 to 55 years of age are reported in this application. Multiple vaccine candidates are being evaluated in this study. For each vaccine candidate, participants received escalating dose levels (N=12 per dose level) with progression to subsequent dose levels based on recommendation from a Sponsor Safety Review Committee (SRC).

Phase 1/2/3 Study C4591001

Study C4591001 is the ongoing, randomized, placebo-controlled, Phase 1/2/3 pivotal study for registration. It was started as a Phase 1/2 study in adults in the US, was then amended to expand the study to a global Phase 2/3 study planning to enrol ~44,000 participants to accrue sufficient COVID-19 cases to conduct a timely efficacy assessment; amended to include older adolescents 16 to 17 years of age, then later amended to include younger adolescents 12 to 15 years of age. In Phase 1, two age groups were studied separately, younger participants (18 to 55 years of age) and older participants (65 to 85 years of age). The study population includes male and female participants deemed healthy as determined by medical history, physical examination (if required), and clinical judgment of the investigator to be eligible for inclusion in the study. Exclusions included screened individuals with high risk of exposure to SARS-CoV-2 infection due to exposure in the workplace and/or medical conditions that represent risk factors, clinically important prior illness or laboratory abnormalities, serological evidence of prior SARS-CoV-2 infection or current SARS-CoV-2 infection as measured by polymerase chain reaction (PCR).

GCP

The Applicant claimed that the Clinical trials included in the application were performed in accordance with GCP.

The applicant has provided a statement to the effect that clinical trials conducted outside the Community were carried out in accordance with the ethical standards of Directive 2001/20/EC.

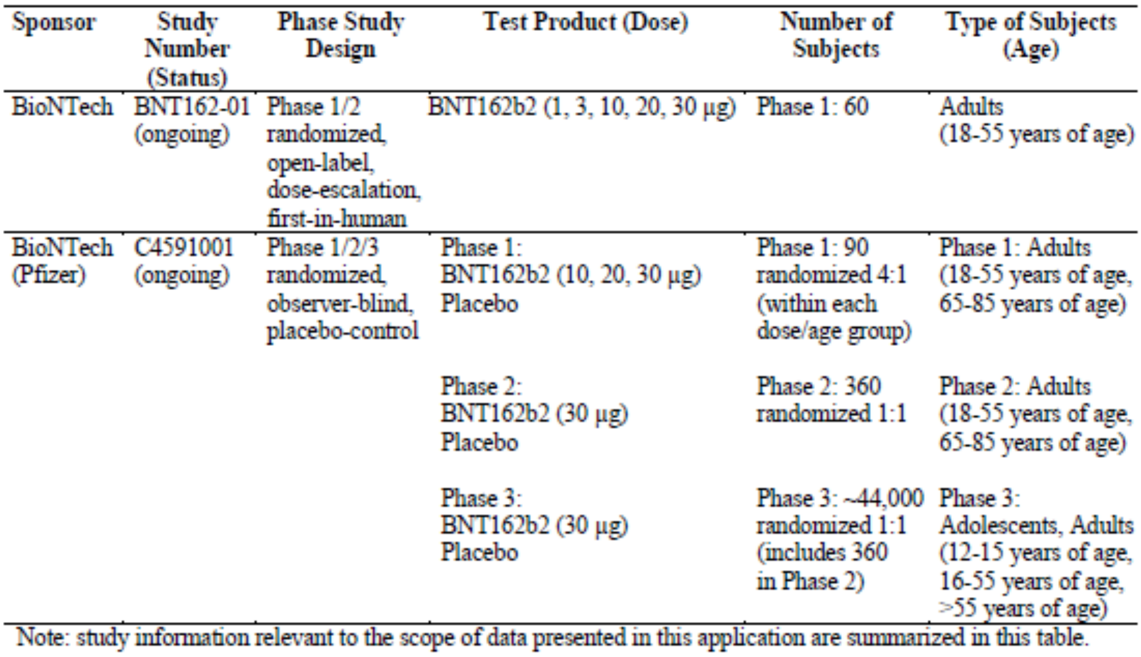
In addition, to seek further reassurance of the GCP compliance of the studies included in this dossier, in the context of the COVID-19 pandemic, EMA gathered additional information as indicated below from EU and non-EU regulatory authorities, and shared them with the CHMP to be considered in the assessment:

- ☒ a full inspection report from GCP inspection by Regierungspräsidium Karlsruhe and Paul-Ehrlich-Institut conducted at one of the investigator sites and at a CRO in Germany for the study BNT 162-01;
- ☒ Establishment Inspection Reports from GCP inspection by Food and Drug Administrations (USA Regulatory Authority) of six investigator sites in USA for study C4591001 (BNT 162-02);
- ☒ A full inspection Report and the summaries of the outcome from two GCP inspections by the National Administration of Drugs, Foods and Medical Devices (Argentinian Regulatory Authority) conducted at the single site located in Argentina for the study C4591001(BNT 162-02).

Based on the review of clinical data and the above-mentioned reports, CHMP did not identify the need for a GCP inspection of the clinical trials included in this dossier.

- ☒ Tabular overview of clinical studies

Table 1 Overview of the Clinical Development



Sponsor	Study Number (Status)	Phase Study Design	Test Product (Dose)	Number of Subjects	Type of Subjects (Age)
BioNTech	BNT162-01 (ongoing)	Phase 1/2 randomized, open-label, dose-escalation, first-in-human	BNT162b2 (1, 3, 10, 20, 30 µg)	Phase 1: 60	Adults (18-55 years of age)
BioNTech (Pfizer)	C4591001 (ongoing)	Phase 1/2/3 randomized, observer-blind, placebo-control	Phase 1: BNT162b2 (10, 20, 30 µg) Placebo	Phase 1: 90 randomized 4:1 (within each dose/age group)	Phase 1: Adults (18-55 years of age, 65-85 years of age)
			Phase 2: BNT162b2 (30 µg) Placebo	Phase 2: 360 randomized 1:1	Phase 2: Adults (18-55 years of age, 65-85 years of age)
			Phase 3: BNT162b2 (30 µg) Placebo	Phase 3: ~44,000 randomized 1:1 (includes 360 in Phase 2)	Phase 3: Adolescents, Adults (12-15 years of age, 16-55 years of age, >55 years of age)

Note: study information relevant to the scope of data presented in this application are summarized in this table.

Table 2 Overview of the pivotal phase 3 study

Study ID	No. of study centres / locations	Design	Study Posology	Study Objective	Diagnosis Incl. criteria	Primary Endpoint
C4591001	131 United States 9 Turkey 6 Germany 4 South Africa 2 Brazil 1 Argentina.	randomized, multinational, placebo-controlled, observer-blind,	2 doses of 30 µg given 21 days apart	Primary: To evaluate the efficacy of BNT162b2 against confirmed severe COVID-19 occurring from 7 and 14 days after the 2nd dose in participants with and without evidence of infection before vaccination	Healthy volunteers at risk of COVID-19	COVID-19 incidence per 1000 person-years of follow-up based on central laboratory or locally confirmed NAAT in participants with no serological or virological evidence (up to 7 days after receipt of the second dose) of past SARS-CoV-2 infection

2.4.2. Pharmacokinetics

Not applicable.

2.4.3. Pharmacodynamics

Mechanism of action

The nucleoside-modified messenger RNA in the vaccine is formulated in lipid nanoparticles, which enable delivery of the RNA into host cells to allow expression of the SARS-CoV-2 S antigen. The vaccine elicits both neutralizing antibody and cellular immune responses to the spike (S) antigen, which may contribute to protection against COVID-19.

Immunogenicity studies

For vaccines, pharmacodynamics relates to investigation of immunogenicity. The available data were generated from the phase 1/2 study BNT162-01 conducted in Germany, and from the phase 1 and 2 parts of the phase 1/2/3 study C4591001, conducted in the USA (later phases were multinational). Both studies were designed to choose the optimal vaccine candidate and an appropriate dose and schedule for further studies. Among the four prophylactic SARS-CoV-2 RNA vaccines initially tested the following two candidates were selected for further development:

BNT162b1: RNA-lipid nanoparticle (LNP) vaccine containing nucleoside-modified messenger ribonucleic acid (modRNA) that encodes the RBD (receptor-binding domain)

BNT162b2: RNA-LNP vaccine containing modRNA that encodes SARS-CoV-2 full-length, P2 mutant (see section 2.2.2), prefusion spike glycoprotein (P2 S).

Key features of the two studies are summarised in the below table.

Study id	BNT162-01	C4591001
Title	A multi-site, Phase 1/2, 2-part, dose-escalation trial investigating the safety and immunogenicity of four prophylactic SARS-CoV-2 RNA vaccines against COVID-19 using	A Phase 1/2/3, Placebo-Controlled, Randomized, Observer-Blind, Dose-Finding Study to Evaluate the Safety, Tolerability, Immunogenicity, and Efficacy of SARS-COV-2 RNA Vaccine

	different dosing regimens in healthy adults	Candidates Against COVID-19 in Healthy Individuals
Design	This is an open-label, multi-site, Phase 1/2, 2-part, dose-escalation study. Part A of the study includes the first in human dose and dose ranging groups in healthy adults (aged 18 to 85yrs).	This is a Phase 1/2/3, randomized, multinational, placebo-controlled, observer-blind, dose-finding, vaccine candidate–selection, and efficacy study in healthy individuals. The study consists of 2 parts: Phase 1 to identify preferred vaccine candidate(s) and dose level(s); and Phase 2/3 as an expanded cohort and efficacy part.
Immunogenicity objectives	To describe the immune response in healthy adults after dose 1 only or after both dose 1 and dose 2 measured by a functional antibody titre	To describe the immune responses elicited by prophylactic BNT162 vaccines in healthy adults after 1 or 2 doses
Study population	Healthy adults aged 18 to 55yrs BNT162b1: N=84 (12/group) BNT162b2: N=60 (12/group) Healthy adults aged 56-85 yrs BNT162b1: N=36 (12/group) BNT162b2: N=36 (12/group)	Male or female participants between the ages of 18 and 55 years, inclusive, and 65 and 85 years, inclusive Phase 1 comprised 15 participants (randomization ratio of 4:1 so that 12 received active vaccine and 3 received placebo) per group; 13 vaccine groups were studied, corresponding to a total RISDUWLFLSDQWVWKHIGRVH was only used in the younger adult cohort)
IMP and dose level	BNT162b1JJJJ JJDQGJJ BNT162b2JJJJ J	BNT162b1: JJJJ J BNT162b2: JJJ Placebo: normal saline
Dosing frequency	Two injections ~21d apart	Two injections ~21d apart
Immunogenicity endpoints	Virus neutralization test (VNT). Antibody binding assay, CMI assays, e.g. ELISpot and intracellular cytokine staining (ICS).	SARS-CoV-2 neutralization assay S1-binding IgG level assay RBD-binding IgG level assay N- binding antibody assay

Endpoints and Assays used to evaluate immunogenicity

In Study BNT162-01, immunogenicity was evaluated in Phase 1 using a SARS-CoV-2 serum neutralization assay to determine neutralizing titres and the fold rise in SARS-CoV-2 serum neutralizing titres. Immunogenicity was assessed at Day 1 (before Dose 1) and 7 days after Dose 1 (Day 8); and at Day 22 (before Dose 2) and 7 days, 14 days, and 21 days after Dose 2. Only qualified assays were used. In addition, T cells isolated from peripheral blood mononuclear cells (PBMCs) obtained from whole blood samples of vaccinated Phase 1 participants were evaluated by enzyme-linked immuno-spot (ELISPOT) and intracellular cytokine staining visualized with fluorescence activated cell sorting (FACS). Blood samples were collected from study participants prior to the first vaccine dose and on Day 29 (7 days) after the second vaccine dose. Assessments included cytokines associated with Th1 responVHVVXFKDV,)1DQG,/□ -2 and those associated with Th2 responses such as IL-4, to analyse the induction of balanced versus Th1-dominant or Th2-dominant immune responses.

In Study C4591001, immunogenicity was evaluated in Phase 1 and Phase 2 using a SARS-CoV-2 serum neutralization assay to determine titres and a SARS-CoV-2 RBD- or S1-binding IgG direct Luminex immunoassay to determine antibody binding levels. Fold rises were assessed also. Only qualified assays were used. In Phase 1, immunogenicity was assessed at Day 1 (before Dose 1) and 7 days after Dose 1; and at Day 21 (before Dose 2) and 7 days, 14 days, and 1 month after Dose 2. Data were summarized for each dose level and age group. In Phase 2, immunogenicity was assessed at Day 1 (before Dose 1) and 1 month after Dose 2. Data were summarized for each age strata group and by evidence of prior SARS-CoV-2 infection at baseline per NAAT (PCR) or N-binding IgG assay. To facilitate interpretation of immunogenicity data generated in Study C4591001, a human convalescent serum (HCS) panel was obtained from Sanguine Biosciences (Sherman Oaks, CA), MT Group (Van Nuys, CA), and Pfizer Occupational Health and Wellness (Pearl River, NY). The 38 sera in the panel were collected from SARS-CoV-2 infected or COVID-19 d□DIIRQVHG□DQG□LYLGXDOVWREDUVRIDIHGDVDIWHUB3&5□ -confirmed diagnosis at a time when they were asymptomatic. The serum donors had predominantly had symptomatic infections (35 of 38) including 1 who had been hospitalized. In Phase 3, exploratory immunogenicity assessments are planned at time points up to 24 months, to be reported at a later time.

These are the immunogenicity assays that were used in clinical trials:

Single-plex Direct Luminex Assay for Quantitation of SARS-CoV-2 S1-binding IgG in Human Serum

Single-plex Direct Luminex Assay for Quantitation of SARS-CoV-2 RBD-binding IgG in Human Serum

Roche Elecsys SARS-CoV-2 N Binding Antibody Assay

mNeonGreen SARS-CoV-2 Microneutralization Assay

ELISpot Assay

Intracellular Cytokine Staining (ICS) for BNT162b1 and BNT162b2

The SARS-CoV-2 Wuhan-Hu-1 isolate spike glycoprotein (GenBank accession # QHD43416.1) is the reference sequence for the recombinant S1 and RBD proteins used in the Luminex assays. The SARS-CoV-2 neutralisation assay used a previously described strain of SARS-CoV-2 (USA_WA1/2020).

Study BNT162 -01

Immunogenicity - functional antibody responses (secondary objectives)

Functional antibody titre data are available up until Day 43 for younger adults (18 to 55 yrs) dosed □WKDQGI%17ERQIDVDOOGRVHOHYHOVDQGDOOGRVHOHYHOVH[FHSW□ IQISHUIURXS□ . Data are available IRUWKHDQGIXSXQW□OIDIRURXQIHUDGKXOWV□ GRVHGLWKDQGI%17ERQIDVDQGGRVHOHYHOIQGRVHOHYHOV□ DQGIQ□□

Virus neutralizing antibody GMTs for participants aged 18 to 55 years after dosing with BNT162b1, are shown in Figure 3. On Day 22, at 21 d after the first dose, virus neutralizing antibody GMTs had increased in a dose-dependent manner for all dose groups. At 7 d after the second dose (Day 29), QHXWUDOL]LQJ*07VVKRZHGDVWURQJGRVHOHYHOGHSHQGHQWERRVWHUUHVSRQVH,QWKHGRVHJURXS□

which was only dosed once, neutralizing GMTs remained at a lower level, indicating that a booster dose is necessary to increase functional antibody titres.

On Day 43 (21 d after the second dose of BNT162b1), neutralizing GMTs decreased (with exception of WKHIGRVHOHYHODYLUXVQ eutralizing GMTs were 0.7-IROGWR□ -IROGWKRVHRID□ COVID-19 HCS panel.

The COVID-19 HCS panel is comprised of 38 human COVID-19 HCS sera drawn from individuals aged 18 to 83 yrs at least 14 d after confirmed diagnosis and at a time when the individuals were asymptomatic.

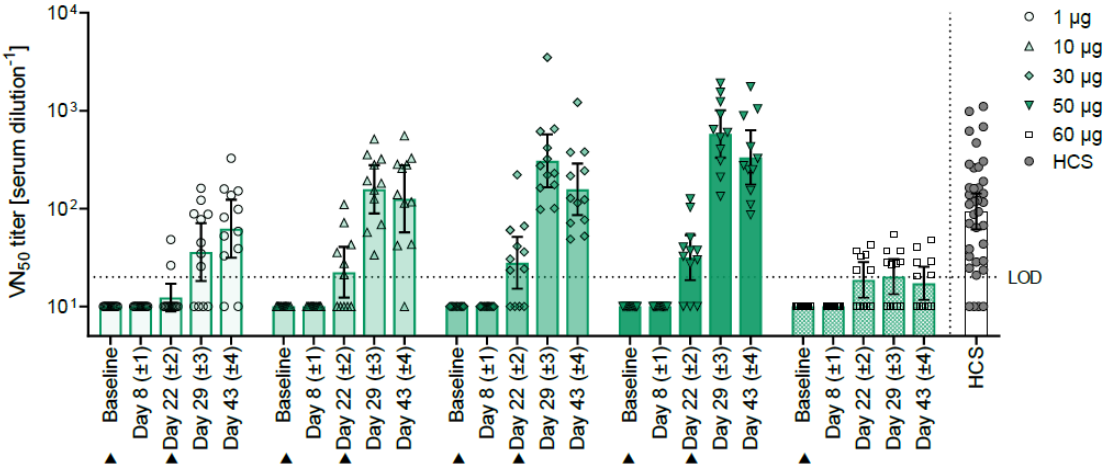


Figure 3: BNT162b1 – Functional 50% SARS-CoV-2 neutralizing antibody titers (VN50) – IMM

VN_{50} titers with 95% confidence intervals are shown for younger participants (aged 18 to 55 years) immunized with RU% 17E9DOXHVVPDOOHUWKDQWKHOLPLWRIGHWHFWLRQ/2'DUHSORWWHGDV/2'□ Arrowheads indicate baseline (pre-Dose 1, Day DQGGRVHDVQRWSHUIRUPHGLQWKH□ dose group. The dotted horizontal line represents the LOD. IMM = Immunogenicity set; VN50 = 50% SARS-CoV-2 neutralizing antibody titers; HCS = human COVID-19 convalescent serum

For virus neutralizing antibody GMTs for participants aged 18 to 55 yrs after dosing with BNT162b2, see Figure 4. Participants dosed with BNT162b2 showed a strong IMP-induced antibody response. Virus neutralizing GMTs were detected at 21 d after Dose 1 (Day 22) and had increased substantially in RXQJHUSDUWLFLSDQWVDJHGWRUVLPPXQL]HGZLWK%17EDQGROGHUSDUWLFLSDQWV□ (aged 56 to 85 yrs) immunized with 20 µg BNT162b2 by 7 d after Dose 2 (Day 29). Day 29 virus neutralizing GMTs were comparable between the younger and older adult in the 20 µg dose level cohorts. The lowest tested dose of 1 µg BNT162b2 elicited only a minimal neutralizing response in participants aged 18 to 55 yrs.

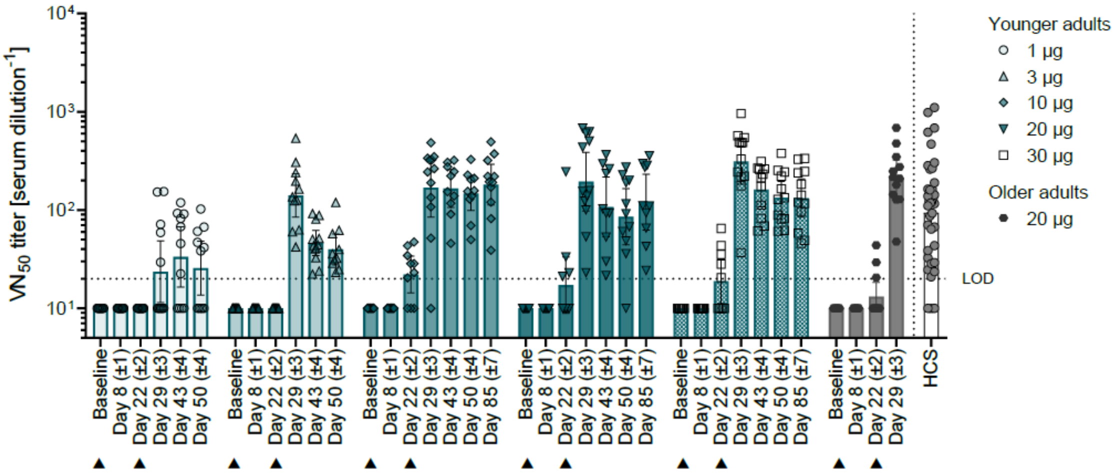


Figure 4: BNT162b2 – Functional 50% SARS-CoV-2 neutralizing antibody titres (VN50) – IMM
VN50 titres with 95% confidence intervals are shown for younger adults (aged 18 to 55 years) immunized with 1, 3,
RU1I%17VFDQGROGHUDGXOWVDJHGWRUVLPPXQL]HGZLWKJ%17E9DOXHVPDOOHU
than the limit of detection (LOD) are plotted as 0.5*LOD. Arrowheads indicate baseline (pre-Dose 1, Day 1) and Dose 2 (Day 22). The dotted horizontal line represents the LOD.
IMM = Immunogenicity set; VN50 = 50% SARS-CoV-2 neutralizing antibody titers; HCS = human COVID-19 convalescent serum.

Neutralisation of different spike protein mutants

Different pseudoviruses including RBD sequence variants have been tested in a pseudovirus neutralization assay with sera from BNT162b1-and BNT162b2-immunized participants in the BNT162-01 study. Efficient neutralization of spike protein mutants was observed with sera from BNT162b1- and BNT162b2-immunized participants demonstrating the neutralization breadth of vaccine-elicited polyclonal antibodies.

BNT162b2-induced virus neutralization titers with pseudovirus 50% neutralization titers (pVNT50) across a pseudovirus panel with 19 SARS-CoV-2 spike protein variants including 18 RBD mutants and the dominant spike protein variant D614G. LLOQ = Lower level of quantification (at 300). Data shown as group (total n=5) GMT with 95% CI.

Cell mediated immunity (CMI)

0,UPDVUGLQWUPVRI)1- producing CD4+ and CD8+ T cells by ELISpot. Both vaccine candidates elicited clear responses (baseline vs post-dose 2). Further characterisation was determined XVLQJIQWUDFHOOXODUFWRNLQHVWDLQLQJIRU7KFWRNLQH-2)) and Th2 cytokines (IL-4). Both vaccine candidates stimulated predominantly Th1 responses, both in CD4 and CD8 T cells.

Study C4591001

Methods

The statistical analyses of immunogenicity data from Study C4591001 were based on the evaluable immunogenicity populations and all-available immunogenicity populations. Phase 1 and Phase 2 data were reported as the following, for SARS-CoV-2 serum neutralizing titers and SARS-CoV-2 S1-binding and RBD-binding IgG concentrations:

- geometric mean titers/concentrations (GMTs/GMCs)
- geometric mean-fold rise (GMFR)
- geometric mean ratio (GMR) (for Phase 1 only)
- SURSRUWLRQVRISDUWLFLSDQWVZ fold rise (for Phase 1 only)
- antibody titers/levels at defined thresholds (for Phase 2 only)

For immunogenicity results of SARS-CoV-2 serum neutralizing titers and S1- or RBD-binding IgG concentrations, GMTs or GMCs were computed with associated 95% CIs.

The GMFR was calculated by exponentiating the mean of the difference of logarithm transformed assay results: (later time point) – (earlier time point) with two-sided CIs. The GMR was calculated as the mean of the difference of logarithm transformed assay results: (SARS-CoV-2 serum neutralizing titers) – (SARS-CoV-2 anti-S binding antibody) for each participant, then exponentiating the mean, with two-sided CIs.

Results

The study set out to evaluate 2 SARS-CoV-2 RNA vaccine candidates, as a 2-dose (separated by 21 days) VFKHGXOHDWGLIIHUHQWGRVHOHYHOV%17EDQG%17EDQG JDQGLQGLIIHUHQWDJHJURXSV -85 y), to select a vaccine and dose level for further testing in Phase 2/3. Cut-off date: 24-Aug-2020 (1 month post-dose 2 = D52).

Immunogenicity results are available for both adult age groups up to 1 month post-Dose 2 for the BNT162b1 and BNT162b2 vaccine candidates at the 10-µg, 20-µg, and 30-µg dose levels, and up to 7 weeks after Dose 1 of BNT162b1 at the 100-µg dose level (younger age group only).

Results for the 7 days after Dose 1 time point are only analysed and presented in the younger age group (18 to 55 years of age) for 10 µg and 30 µg BNT162b1.

Immunogenicity results SARS-CoV-2 Neutralizing Titres

BNT162b1

In the younger age group, SARS-CoV-2 50% neutralizing GMTs modestly increased by Day 21 after Dose 1 and were substantially increased 7 days after Dose 2 (Day 28) of BNT162b1 (Figure 5).

Generally similar trends were observed in the older age group, with higher GMTs observed in the 20-JJ and 30-JGRVHJURXSVRI%17ECFRPSDUHGWRWKH JGRVHJURXS)LJXUH 6). In the older age group, the SARS-CoV-2 50% neutralizing GMTs were generally lower than the GMTs in the younger age group.

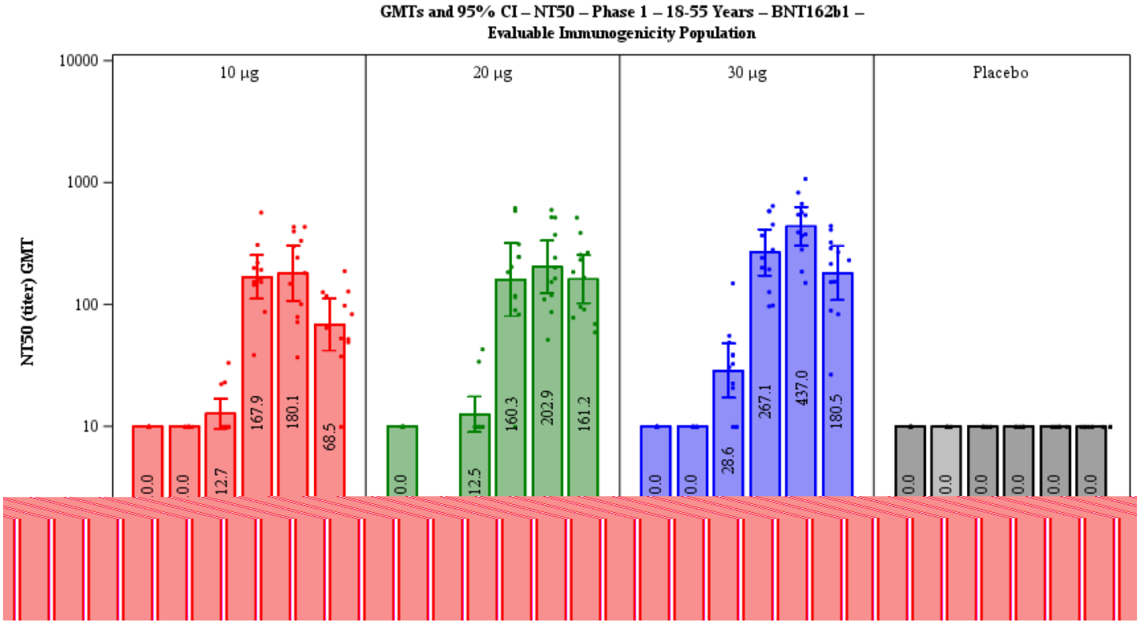


Figure 5. Geometric Mean Titers and 95% CI: SARS-CoV-2 Neutralization Assay - NT50 – Phase 1, 2 Doses, 21 Days Apart – 18-55 Years of Age – BNT162b1 – Evaluable Immunogenicity Population

Figure 6. Geometric Mean Titers and 95% CI: SARS-CoV-2 Neutralization Assay - NT50 – Phase 1, 2 Doses, 21 Days Apart– 65-85 Years of Age – BNT162b1 – Evaluable Immunogenicity Population